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# An Evaluation of the Economic Impact of P.L., 101-336, Americans with Disabilities Act on a Community Hospital

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AN EVALUATION OF THE ECONOMIC IMPACT OF P.L. 101-336,  
AMERICANS WITH DISABILITIES ACT ON A COMMUNITY HOSPITAL.

A Thesis  
Presented to  
the Faculty of the Department of Public Health  
Western Kentucky University  
Bowling Green, Kentucky

In Partial Fulfillment  
of the Requirements for the Degree  
Master of Science

by  
Jean E. Craig, M.T., A.S.C.P.  
December, 1993

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AN EVALUATION OF THE ECONOMIC IMPACT OF P.L. 101-336,  
AMERICANS WITH DISABILITIES ACT ON A COMMUNITY HOSPITAL.

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Public Law 101-336, Americans With Disabilities Act (ADA), is comprehensive legislation created with the intention of integrating the disabled into the work place and every segment of society. Forty-three million Americans are disabled. Of these, twenty-three million seek employment, but because of discrimination are unable to find work. The law provides requirements for access to public accommodations. All disabled Americans deserve the opportunity to enjoy the same public services as the non-disabled.

Businesses are now required to provide reasonable accommodations to a disabled employee if these accommodations will allow the employee to perform the essential functions of the job. Businesses are also required to make necessary renovations to their facilities to allow the disabled to move freely about and enjoy the services and amenities of the facility.

This researcher attempts to compile the costs of complying with the ADA in one hospital. The analysis is limited to one facility. However, the findings may be beneficial to other facilities because severe civil penalties can be levied on facilities which do not comply.

The study involved surveying a healthcare facility using points from Title I of the ADA determined by the researcher to be necessary for compliance. Title III compliance was accomplished using a facility survey form developed by the American Hospital Association.

The researcher compiled total expenditures by The Medical Center at Bowling Green, Bowling Green, Kentucky, to comply with Titles I and III of the ADA as well as projected costs associated with recommendations to resolve deficiencies.

The findings support the hypothesis that practical approaches and inexpensive solutions are readily available so facilities can fully comply with the intent of the law and avoid undue hardship.

## CHAPTER 1

### Introduction

The Americans With Disabilities Act (ADA) of 1990, P.L. 101-336, was signed into law by President George Bush on July 26, 1990 and has been hailed as the "Emancipation Proclamation of the disabled."<sup>1</sup> It is comprehensive in nature and was created with the intention of integrating the disabled into the workplace and every segment of society. This act expands access to employment, leisure opportunities, and public accommodations for many people otherwise excluded. It provides employers and managers with guidelines for accessibility. The ADA is the culmination of congressional attempts to eradicate discrimination faced by 43 million Americans with disabilities, one-sixth of the population of the country.<sup>2,3</sup> President Bush noted ADA will insure the disabled "independence, freedom of choice, control of their own lives, and the opportunity to blend fully and equally into the rich mosaic of the American mainstream."<sup>4</sup> According to the vice-chairman of the U.S. Equal Employment Opportunity Commission (EEOC), the ADA represents a "cataclysmic change."<sup>5</sup>

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<sup>1</sup>Richard Pimentel, Denise Bissonnette, and Michael J. Lotito, Esq, What Managers & Supervisors Need to Know About The Americans With Disabilities Act, (Northridge, Ca.: Milt Wright & Associates, 1992), 1.

<sup>2</sup> Lisa Scott, "ADA Compliance to be Costly for Docs," Modern Healthcare, 30 November 1992, 2.

<sup>3</sup>Burton Fishburn, "Accessibility Takes Effect," Architecture, February 1992, 105.

<sup>4</sup>John R. Snyder, Ph.D., M.T. (ASCP),SH, "Open Your Door to the Disabled-It's the Law," MLO, August 1992, 49.

<sup>5</sup>Anne Paxton, "Complying With the ADA: A Lab Manager's Guide," Management Briefs, 14, (August 1992): 1.

The discrimination protection provided by this federal act is similar to that provided against race, religion, national origin, and sex. Private businesses, health facilities, restaurants, hotels, and labor unions are among those covered by this legislation. State and local governments are not covered under ADA Title III, but rather Department of Justice Title III regulation.

Anti-discrimination legislation is not entirely new. Section 504 of the Rehabilitation Act of 1973 makes it illegal for any company receiving in excess of \$2,500 from Medicare, Medicaid, or other federal agencies to discriminate against disabled persons.<sup>6</sup> The Civil Rights Restoration Act of 1988 extended the scope of the 1973 Rehabilitation Act by applying it to all programs and activities receiving federal funds.<sup>7</sup> The ADA does not preempt the Rehabilitation Act nor invalidate any other state, federal, or local laws that provide protection for the disabled. The Americans with Disabilities Act takes the Affirmative Action program a step further by removing the stipulation that organizations receive federal funds.

An important difference between ADA and other civil rights laws is that ADA defines how a person will be qualified for a job if he/she can perform the "essential functions" of the job, and if he/she can not do the "essential functions" but is otherwise qualified, the employer must provide "reasonable accommodations" unless it causes the employer "undue hardship."<sup>8</sup> The Act does not require that persons with disabilities attain the identical level of achievement as non-disabled persons, but disabled persons

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<sup>6</sup>John R. Snyder, Ph.D., M.T. (ASCP),SH, "Open Your Doors to the Disabled-It's the Law," MLO, August 1992, 50.

<sup>7</sup>Ibid.

<sup>8</sup>Compliance Guide to the Americans with Disabilities Act (Washington, D.C.: Employment Policy Foundation [1991]).



must be given an equal opportunity in the same setting. Under ADA the employer is not required to create a job for a disabled employee nor maintain any quota in terms of the percentage of employees with a disability.<sup>9</sup> An employer is not expected to lower the standards required for a job and may still require education, experience, and the essential skills currently required. The provisions of this act are not limited to any one area of the workplace nor does it pertain only to job employment. Rather, it is equally applied to all areas including access to public services by employees and customers.

An individual is considered disabled if he or she has a physical or mental impairment that substantially limits one or more of the major life activities of the individual, has a record of such impairment, or is regarded as having such an impairment.<sup>10</sup> A physical or mental impairment is defined as any psychological disorder or condition, cosmetic disfigurement, or anatomical loss affecting one or more of the following body systems: neurological, musculoskeletal, special sense organs, respiratory (including speech organs), cardiovascular, reproductive, digestive, genitourinary, hemic and lymphatic, skin, and endocrine, or any mental or psychological disorder, such as mental retardation, organic brain syndrome, emotional or mental illness, and specific learning disabilities.<sup>11</sup> Persons diagnosed as having AIDS or having contact with someone with the disease are also protected. Therefore, a spouse or sexual partner of someone with AIDS or known to have tested positive can not be discriminated against just because an employer feels the individual may miss work to care for the AIDS victim or might acquire the disease themselves and incur extensive medical claims in

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<sup>9</sup>Elliot Shaller, "Reasonable Accommodations Under the Americans With Disabilities Act-What Does it Mean?" Employee Relations Law Journal, 16, Spring 1991, 433.

<sup>10</sup>Scott, 3.

<sup>11</sup>Department of Justice, "Nondiscrimination on the Basis of Disability in State and Local Government Services; Final Rule," Federal Register (26 July 1991) vol. 56, no. 144, p. 35698.

addition to missing work. Contagious diseases are protected unless the disease poses a direct threat to co-workers. The ADA does not preempt state and local public health law regarding food handling. An employer may refuse to put an employee with an infectious disease in positions which could potentially lead to the spread of the disease to the public or co-workers.

Also covered under the ADA are individuals the employer considers to have a high risk of incurring a work related injury and requiring extensive medical treatment or with a previous history of a problem. An example is the individual with a previous diagnosis of cancer, but who is now cancer-free. The employer may fear that the individual will again become ill and potentially incur high medical bills under the medical plan provided by the employer. Further, an employer may not discriminate against obese or disfigured persons because of the fear that a client may be offended. The subjectivity of the law precludes that the determination of a disability will have to be made on a case-by-case basis.

One pertinent phrase in the law is "record of impairment." Individuals who have previously been treated for a physical or mental problem but are currently not suffering from the impairment are protected as well as individuals who may have been erroneously diagnosed. The law protects individuals from the prejudice of the public.

At least 900 disabilities reportedly are covered by the Americans With Disabilities Act.<sup>12</sup> The excluded conditions are stated in Title V of the ADA and include: homosexuality, bisexuality, pedophilia, transsexuality, exhibitionism, voyeurism, compulsive gambling, kleptomania, and pyromania. Current use of illegal drugs by an individual who is otherwise disabled will not automatically exclude him or her from the protection of the

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<sup>12</sup>Scott, 3.



ADA if the individual also uses or is addicted to drugs. The individual will be excluded from ADA protection if the action of the employer is based on the illegal drug use and not the protected disability.<sup>13</sup>

Congress, when studying the disabled, found that as a group they had inferior social, economic, vocational, and educational status.<sup>14</sup> Workers with disabilities and greater than or equal to twelve years education earned only 73% as much as their non-disabled counterparts.<sup>15</sup> In 1987 disabled workers in general earned only 64% of what their non-disabled colleagues earned.<sup>16</sup> This discrimination against the disabled costs the federal, state, and local governments billions of dollars in subsistence to the disabled as well as loss of tax revenue that working individuals would input into the economy.

### Purpose

Section 302 of the text of PL-101-336 states:

"No individual shall be discriminated against on the basis of disability in the full and equal enjoyment of the goods, services, facilities, privileges, advantages, or accommodations of any place of public accommodation by any person who owns, leases, or operates a place of public accommodation."

The purpose of this research study is to determine if a hospital facility can be in compliance with the law regarding employees and public services,

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<sup>13</sup>Ibid., 8.

<sup>14</sup>Employment Policy Foundation, 1.

<sup>15</sup>Pimentel, Bissonnette and Lotito, 38.

<sup>16</sup>Scott, 3.

determine steps to be taken to insure compliance, and determine the economic impact to the facility.

By 1995 the number of 18-24 year old workers in the labor market will shrink by two million.<sup>17</sup> This situation will have a great effect in the workplace. Employers will be forced to look beyond the traditional sources of employees.

People with disabilities are currently the largest source of underutilized workers. There is a 73% unemployment rate among the disabled according to the Architectural and Transportation Barriers Compliance Board (ATBCB) in Washington, D.C.<sup>18</sup> Forty-three million people living in this country have a disability.<sup>19</sup> Sixty-seven to sixty-eight percent of these are unemployed.<sup>20</sup> Eighty-two percent of those unemployed want to work. Thus, over 23 million disabled people want to work but because of discrimination and other reasons are unable to find jobs.

High unemployment always has an economic impact on our society. The fiscal year 1986 expenditure was \$169.4 billion for programs for the disabled (Social Security Disability, Special Supplementary Income (SSI), Worker's Compensation, welfare programs, and private reimbursement for on-the-job injuries).<sup>21</sup> In fiscal year 1987, Social Security alone paid out \$28.2 billion in benefits to the unemployed disabled. A significant financial benefit exists to our society if these disabled people were employed tax-payers and were no longer required to receive government benefits. Retail businesses would benefit from the increased purchasing power of these newly employed and their ability to use it.

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<sup>17</sup>Pimentel, Bissonnette and Lotito, 42.

<sup>18</sup>Fishburn, 105.

<sup>19</sup>Pimentel, Bissonnette and Lotito, 42.

<sup>20</sup>Ibid.

<sup>21</sup>Snyder, 50.

Employers need to recognize the valuable resource available in the disabled worker. In 1986 Louis Harris conducted a poll of 900 managers from various businesses. Those results indicated three out of four managers admitted discriminating against the disabled. Seventy-five percent agreed that hiring the disabled costs about the same as hiring anyone else, yet only 43% have done so.<sup>22</sup> Ninety-five percent of these same managers felt the disabled work as hard or harder than any other employees.<sup>23</sup> Forty percent said disabled employees have better attendance records and are more punctual.<sup>24</sup>

The government now protects the 43 million disabled individuals seeking employment and public services and forces employers and managers to comply with the new law. Problems arise when the employer finds it necessary to rewrite job descriptions in order to state "essential functions," provide reasonable accommodations, and ensure public accommodations and benefits for the disabled.

As stated in the text of the law, no one shall be discriminated against because they have a disability. The management of a facility must make necessary changes to remove barriers and provide access to the services of the facility. To accomplish this task a survey of the facility is necessary to assess the current status and implement changes as necessary to comply with the intent of the law.

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<sup>22</sup>Snyder, 50.

<sup>23</sup>Ibid., 53.

<sup>24</sup>Ibid., 53.

## Glossary

To enable the reader to understand the problem discussed in this study, pertinent terminology is explained.

**Direct threat** - A significant risk to the health or safety of others that cannot be eliminated by reasonable accommodation.

**Disability** - Physical or mental impairment that substantially limits one or more major life activities, record of impairment, or is regarded as having an impairment.

**Employer** - All private and public employers who have 15 or more employees in each working day in each of 20 or more calendar weeks in the current or preceding year.

**Essential functions** - Those functions that the individual who holds or desires the position must be able to perform unaided or with the assistance of a reasonable accommodation.

**Impairment** - Any physiological disorder or condition, cosmetic disfigurement, or anatomical loss.

**Major life activity** - Includes caring for oneself, performing manual tasks, walking, seeing, hearing, sitting, speaking, breathing, learning, working, and participating in community activities.

**Public Accommodation** - A private entity that maintains a place to which the public is invited for commercial, social, or recreational purposes.

**Qualified individual with a disability** - An individual with a disability who with or without reasonable accommodation can perform the essential function of the employment position that such individual holds or desires.

**Readily Achievable** - Easily accomplished and able to be carried out without much difficulty or expense.

**Reasonable Accommodation** - Any change in the work environment or the way things are customarily done which will allow an individual with a disability equal employment opportunity. This includes the application process, essential functions of the job, and benefits.

**Undue Hardship** - An action requiring significant difficulty or expense as determined by the nature and cost of accommodation, the overall financial resources of the business, and the impact of such an accommodation upon it.

### Need For Study

The need for the study becomes apparent when one investigates the long list of requirements necessary to comply with ADA and then envisions the repercussions of noncompliance. Hospitals were given a very short time to comply. Some facilities have taken the approach that any "good faith" effort on their part will put them in a relatively safe position with those who inspect. According to Rhonda A. Rhodes, American Hospital Association Senior Counsel, "facilities should not be lulled into a false sense of security, and health care executives should be aware of the adverse publicity that could result if a charge is filed against them."<sup>25</sup> Hospitals must make patient care and public areas physically accessible in ways which were previously not mandated. They must revise work areas and employment policies and practices in order to accommodate employees, job applicants, and visitors

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<sup>25</sup>Ellen Weisman, "ADA and Health Facilities: Some Progress, Problems," Health Facilities Management, February 1993, 26.



with disabilities. The ADA applies to virtually every employer and will result in structural and procedural changes being made in 119,000 medical facilities of all sizes.<sup>26</sup>

The Equal Employment Opportunity Commission (EEOC), the organization that oversees Title I, expected 12,000 - 15,000 complaints by the end of the first year.<sup>27</sup> EEOC anticipated two-thirds of the initial charges to be filed by current employees with a disability that requires a reasonable accommodation. The remaining one third was expected from those disabled individuals seeking employment.<sup>28</sup> Since the effective date of the ADA, 500 complaints have been filed including claims against public accommodations and state/local government.<sup>29</sup>

Civil penalties of as much as \$50,000 can be levied for a first violation. Subsequent violations could cost as much as \$100,000.<sup>30</sup> In a litigation the burden of proof of discrimination lies with the complainant. However, an employer must show proof that a requested accommodation was not elected because of undue hardship.<sup>31</sup>

A recent adjudicated case involved Westchester County Medical Center in Valhalla, N.Y. Westchester County Medical Center agreed to hire an HIV-infected pharmacist with no duty restrictions and pay \$300,000 in back wages and damages rather than lose more than \$100 million in annual federal funding. They had previously agreed to hire him on a restricted basis once they discovered he was infected with Human Immunodeficiency Virus (HIV).

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<sup>26</sup>Steve Taravella, "Hospitals Act to Accommodate Americans with Disabilities Act," Modern Healthcare, 27 January 1992, 29.

<sup>27</sup>Ibid., 30.

<sup>28</sup>ADA Update, 1992, Borgman, Associates., 1.

<sup>29</sup>Ibid., 4.

<sup>30</sup>Travella, 30.

<sup>31</sup>Patrick O'Hare J.D. and William Schmidt J.D., "Federal Disabilities Act Increases Litigation Risks for Prodigers," Health Progress, April 1991, 44.

The court ruling was upheld by the HHS Civil Rights Reviewing Authority.<sup>32</sup> The case is under further appeal.

The Department of Justice is the federal agency responsible for the implementation and monitoring of Title III of ADA which deals with public accommodations. It will normally seek voluntary compliance rather than litigation.

The Director of Design & Construction for the American Hospital Association estimates hospitals will spend \$20 million within the next decade to meet the physical access changes required by the law.<sup>33</sup> In contrast, the federal office on ADA believes incorporating accessibility features in new buildings will add less than one percent to the construction costs of a project.<sup>34</sup> Changes must be made, however, in existing facilities as well as the requirements incorporated into new facility designs and renovations. Changes include, but are not limited to, installing ramps, grab bars, lower telephones, Braille identification in elevators, flashing alarms, wider doorways and aisles, and bathroom accommodations.

Every facility and organization seeking compliance will vary in the number and magnitude of the changes it must make. Older facilities will generally have more changes to make and it will therefore be more costly. The organizations that will be most successful complying with the law are those with leaders who realize this is the law, compliance is required, and who convince all management personnel to acknowledge the law, accept the mandate, and initiate changes.

It would appear beneficial to scrutinize a facility with an analysis of each point of ADA, to check for the ability and ease of compliance, and to

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<sup>32</sup>"Hospital Settles Landmark HIV Case," Modern Healthcare, 8 January 1993, 16.

<sup>33</sup>Taravella, 30.

<sup>34</sup>Ibid.

assess the total economic impact of this government regulation upon the organization.

It is believed that most facilities can comply with the intent of the American's With Disabilities Act with minimal changes and moderate expenditures.

### Assumptions

The assumption is that most changes reflect those required by a comparable sized facility of similar age and size.

### Limitations

The limitation of this study includes the following:

The data collected was obtained from The Medical Center at Bowling Green, Bowling Green, Kentucky. The study will directly reflect the changes already made or necessary at this 14 year old hospital facility offering comprehensive medical services.

### Delimitations

This research project investigated ADA Titles I and III only as these pertain more directly to the health care facilities.



### Hypothesis

Practical approaches and inexpensive solutions are readily achievable so facilities can fully comply with the intent of the law and avoid undue hardship.

## CHAPTER 2

### Review of Related Literature

The ADA ensures the availability of opportunity for the disabled to enjoy public transportation, accommodations, and telecommunication as has not previously been afforded. These opportunities are guaranteed as an employee and also as a private individual.

There are five separate titles to the Americans With Disabilities Act. They are:

- Title I. Employment Provision
- Title II. Public Service Provisions
- Title III. Public Accommodation
- Title IV. Telecommunication
- Title V. Miscellaneous Provisions

#### Title I

Title I, which became effective July 26, 1992 for organizations employing more than twenty-five and will be effective July 26, 1994 for organizations employing fifteen to twenty-four people is enforced by the Equal Employment Opportunity Commission (EEOC). It requires that employers not discriminate against qualified, disabled applicants under any terms or conditions. Title I compliance prohibits employers from discriminating on job applications, hiring or discharge process, compensation,

training, assignments and advancements, and conditions and privileges.

Management decisions on applicant selection must be based solely on the ability of the applicant to perform the essential functions of the job and not on a disability or limitation.

Title I of the Act requires the employer to evaluate each job position within the organization to determine the essential functions. These predetermined functions must be stated in the job description. An essential function is a job duty and the associated qualifications that are absolutely necessary to complete the job successfully. It is a task which must be performed by an employee and a function for which the job exists. As an example, consider a file clerk position for which there is a hearing impaired applicant. The applicant can easily perform the essential tasks associated with filing, but would be unable to answer the telephone. However, if there are other file clerks or a receptionist present, answering the telephone is a nonessential part of that position. It does become an essential task if there is only one or two employees who work that area and when the non-disabled clerk is out of the office, the phones go unanswered. In this case, the function and productivity of that office is jeopardized with a hearing impaired clerk.

The Government plans to leave the determination of "essential functions" to the discretion of the employer. It is in the best interest of the employer to determine the "essential functions" and have written job descriptions prior to interviewing an applicant for a vacant position. This preparation will provide a legal defense for the employer should he be challenged by a disabled applicant. When writing job descriptions, the employer must not be unreasonable or selective in an attempt to disqualify the disabled applicants who may be able to perform the job with minimal accommodations. It is best to do a job analysis and ask persons currently

holding the job what they feel is essential to daily performance. State desired outcomes on the job description rather than a list of tasks since reasonable accommodations can usually be found for individual tasks. What is important is the outcome of the process and the accomplishment of the job. Organizations must review their current policies on interviews, pre-employment exams, and pre-employment medical exams.

Interviews must be conducted skillfully with knowledge of the law. It is no longer acceptable to ask an applicant if he has a disability which may preclude him from doing the job in question. Nor may one ask if the applicant was previously disabled or received Worker's Compensation. If a disability is obvious, the employer may ask for specific ways the applicant would carry out the "essential functions" of the job. The employer should always show the applicant the job description and ask if he can perform the "essential functions" listed either with or without accommodations. An employer is not responsible for providing an accommodation if not informed of the disability. Once an employer becomes aware of an individual's disability, there is an obligation to provide a reasonable accommodation if that individual is otherwise qualified for the job. An employer need not provide an accommodation to a person covered under the ADA by association with a qualified disabled individual, but who themselves are not disabled. An example is the spouse of an individual with Acquired Immune Deficiency Syndrome (AIDS).

Care must be taken if any competency or psychological testing is required during pre-employment screening. It may be necessary to provide readers for applicants or give oral tests to someone if applying for a position that does not require reading or "sighted" skills. It is best to determine whether or not the testing is essential for the selection of a candidate for a job

and does not have a disparate impact on disabled applicants. If possible, an alternative method for determining qualifications should be utilized. The employer must insure all applicants are required to take any tests and not just disabled applicants. If an employer shows the same selection criteria were applied consistently to all applicants even though it resulted in the hiring of a non-disabled applicant, the employer has a defense against discrimination.<sup>35</sup> Some employers have been known to require additional testing to "prove" the disabled applicant can perform the job. This is no longer acceptable. Selection criteria which screen out disabled for reasons unrelated to a disability do not violate the Americans With Disabilities Act.<sup>36</sup>

Pre-employment medical exams are not permitted under Title I. Only physicals conducted after a tentative offer has been made are acceptable. Again, all applicants must be required to take the same exam, the results must be kept confidential, and information must be used in the manner intended by ADA. If the medical examination discloses information that would prevent an applicant from performing the essential functions of a position with an accommodation, or if a reasonable accommodation causes an "undue hardship" on the employer, the offer for employment may be withdrawn. Drug tests are not considered medical exams and employers may continue to test personnel for illegal drug use if that is their policy.

Employers must provide equal benefits for employees. The intent of ADA is that full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations in any place of public accommodation will be available. Employers must insure there is no disparate impact on disabled when providing medical insurance or when

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<sup>35</sup>O'Hare and Schmidt, 44.

<sup>36</sup>Elliot Shaller and Dean A. Rosen, "A Guide to the EEOC's Final Regulation on the American's With Disabilities Act," Employee Relations L.J., Winter 1991-1992, 430.

establishing personnel policies. An example is the limitation of sick days. If a disabled employee requires additional time off work, possibly he could be provided with unpaid leave. An employer may not restrict or deny medical benefits to the disabled. However, one may use "pre-existing condition" clauses in medical insurance packages if applied equally to all.<sup>37</sup> Company outings and social events must be held in a location accessible to disabled employees. Breakrooms, lounges, restrooms, and cafeterias must be accessible to the disabled employee. The employer must also review off-site training sites for accessibility to disabled employees. The employer may be held liable if a hotel or convention center used for a sponsored meeting or event is not accessible to a disabled person. It is always wise to review all contracts made for off-site training and include an indemnification clause for protection against litigation.<sup>38</sup>

Job assignments and promotions are also subject to protection under Title I of the law. The employer must have good justification for selection of one employee over another for advancement. This area may pose less of a practical problem as employers are familiar with employees and better judgment can be utilized in promotions than when trying to hire a new employee. Usually an employee has proven his competence for advancement. Again, employers must judge the disabled employee on the same merit as the non-disabled and not try to predict how the disabled employee will handle the job. The intent of the law is to eliminate bias and prejudice.

Reasonable accommodations are an important part of Title I. This requirement offers a great potential for economic impact depending on the number and type of disabled employees and the accommodations they

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<sup>37</sup>O'Hare and Schmidt, 44.

<sup>38</sup>"What You Should Know About the ADA," Michigan Hospitals, August 1991, 31.



require. Reasonable accommodations refer to any change in the work environment or the way things are customarily done which will allow an individual with a disability equal employment opportunity. An employer is excused from providing a reasonable accommodation if it poses "undue hardship" upon the organization.

Reasonable accommodations generally fall under three categories:

1. those to ensure equal opportunity in the employment process,
2. those that enable disabled employees to perform the essential functions of the position held or desired, or
3. those that enable disabled employees to enjoy the same benefits and privileges of employment as are enjoyed by employees without disabilities.<sup>39</sup>

Employers are obligated to make reasonable accommodations only if the applicant informs the employer of a limitation. Once the limitation is known, the employer may seek assistance from the applicant to determine what would constitute an acceptable and reasonable accommodation. If there are multiple accommodations which would accomplish the same task, the employer is under no obligation to utilize the employee's choice nor choose the most expensive solution. If all considerations are equal, it would seem to be in the best interest of the prospective employee to select the accommodation the employee prefers. Some typical reasonable accommodations include:

1. Facility alterations. Changing around furniture in a work space or raising a desk or counter to accommodate a wheelchair.
2. Job modification. Reassigning some non-essential tasks to other employees.
3. Reassignment to a vacant position. This normally occurs if a

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<sup>39</sup>Scott, 75.

current employee, because of injury or disability, becomes protected under the law and can no longer perform the essential functions of the position he currently holds. The employer is not obligated to create a new position.

4. Acquisition of equipment. Some individuals may require devices to make it possible for them to complete the job. These devices range from Braille material or telephone handset amplifiers to mechanical page turners.

An easy 4-step process for identifying a reasonable accommodation is described in the book, What Managers & Supervisors Need to Know About the ADA. The process includes identifying barriers to performance, identifying possible accommodations, assessing the reasonableness of the accommodation, and choosing an appropriate, reasonable accommodation.<sup>40</sup>

Once the reasonable accommodation choices are apparent, the employer can determine if they will cause an undue hardship upon the organization. The Act does not clearly define what is considered an undue hardship. The definition will vary with the financial means of the particular organization. An accommodation which is unreasonable or an excessive burden for one organization will not necessarily be viewed and justified in the same manner by the EEOC for another organization. Large companies will be expected to expend greater resources than small companies because they generally have more funding available.

An accommodation is also deemed unreasonable if it poses a "direct threat" to others. A direct threat is defined as a significant risk to the health and safety of others that cannot be eliminated by modification of policies,

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<sup>40</sup>Pimentel, Bissonnette and Lotito, 16.



practices, or procedures or by the provision of auxiliary aids or services.<sup>41</sup> An example of a direct threat to others is the employment of an individual with epilepsy and who has lost consciousness during seizures within the past year. That employee might seriously endanger their own life and the lives of others if employed as a bus driver.<sup>42</sup>

A proactive organization will educate managers and co-workers on the Americans With Disabilities Act so they are better informed when writing job descriptions, interviewing, and integrating new disabled employees into their workplace. These activities are accomplished, however, at a cost to the organization.

Remedies for violation of the Americans with Disabilities Act are expected to parallel those afforded Title VII of the Civil Rights Act of 1964 and include injunctions, back pay, attorney's fees, and costs.<sup>43</sup> This liability should serve as an incentive for organizations to make preparations and comply with Title I of this law.

### Title III

Title III of ADA deals with public accommodation and availability of commercial facilities for the disabled. It went into effect January 26, 1992. It requires that private businesses which are open to the public insure individuals with disabilities are able to participate in the goods and services the business offers. As such, the ADA affects not only the facility, but also the policies, procedures, and practices of the organization including the employees themselves. This act covers over five million private

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<sup>41</sup>O'Hare and Schmidt, 45.

<sup>42</sup>Equal Employment Opportunity Commission, A Technical Assistance Manual On the Employment Provisions (Title I) of the Americans With Disabilities Act (Washington, D.C.: GPO, 1992), IV-10.

<sup>43</sup>Scott, 7.

establishments. A few examples are bars, barber shops, restaurants, shopping facilities, professional offices of healthcare providers, and hospitals.<sup>44</sup>

There is no small business exemption under Title III; however, the Department of Veteran Affairs, religious entities, private clubs or establishments, and owner-occupied inns are exempt. Exempt entities are covered instead by Department of Justice Title III regulation.

Access is the key to compliance under Title III. This title covers three different scenarios: existing facilities, new construction, and alterations to existing space. For existing facilities accommodations must be made when they are readily achievable. In new construction with occupancy after January 26, 1993, it requires full compliance. With alterations to existing space occurring after January 26, 1992, they must be accessible to the maximum extent possible.<sup>45</sup> This title of the ADA is enforced by the Department of Justice.

To be covered under ADA, an individual must have either a disability, be perceived as having a disability, or have a relationship or association with a person with a disability. Three factors are considered when deciding if a condition is substantially limiting and truly of consideration: nature and severity of the impairment, duration of the impairment, and long term impact of the impairment.<sup>46</sup> Temporary illness or incapacity such as broken limbs, surgery, or pregnancy are not covered under the ADA.

A review of the published literature on Americans With Disabilities Act did not reveal details of any previous studies similar to the one

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<sup>44</sup>Architectural and Transportation Barriers Compliance Board, "Americans With Disabilities Act (ADA) Accessibility Guidelines for Buildings and Facilities; Final Rule, Federal Register, (26 July 1991) vol 56, no. 144, p. 35408.

<sup>45</sup>Ibid.

<sup>46</sup>Schaller and Rosen, 410.

undertaken. The January, 1993 issue of Health Facilities Management cites statistics from several institutions that have conducted their own surveys and have made necessary changes. AvMed-Santa Fe Healthcare, Gainesville, Florida, created an ADA task force. The task force used a facility survey form to inspect areas possibly in violation of the law so they could be identified and modified to insure compliance. As a result of this survey, the facility spent \$85,000 (\$106 per bed) on ADA compliance in 1992 and will spend another \$550,000 (\$688 per bed) over the next few years.<sup>47</sup>

The financial resources expended varied significantly with different facilities based on many variables. The most significant variables include age of facility, size, and location. Ellen Weisman, author of the Health Facilities Management articles, cites data from the fax poll by the magazine which showed compliance dollars ranging from \$35 per bed for a small 20-year old facility up to \$7,158 per bed for a 452 bed, 68 building campus for the mentally and physically handicapped in Oregon.<sup>48</sup> The latter cost was comparatively high and most likely due to the fact that the major function of the facility is dealing exclusively with handicapped patients and by law is required to comply totally. This, of course, is not the situation with most facilities. The magazine poll revealed the median expenditure for compliance to be approximately \$600 per bed. Stanford University Medical Center reportedly has spent \$600,000 (\$904 per bed) to bring their facility to compliance with California Title 24 which closely parallels the Americans With Disabilities Act.<sup>49</sup>

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<sup>47</sup>Ellen Weismann, "The ADA and Health Facilities: Some Progress and Problems," Health Facilities Management, January 1993, 22

<sup>48</sup>Ibid.

<sup>49</sup>Ibid.

Pertinent government documents have been published to assist facilities in compliance with ADA. Interpretative literature on Title I is available from the Equal Employment Opportunity Commission, EEOC-M-1A, January, 1992. The U.S. Department of Justice has published Accessibility Guidelines for Buildings and Facilities providing a list of each item required and the specification involved for each accommodation for Title III.

In the private sector, Gavin S. Appleby, JD, published an article entitled "The Coming of the ADA: Five Ways to Prepare Now" suggesting steps which can be followed to insure compliance with the law. These steps are as follows:

1. Identify and evaluate physical impediments.
2. Review and redefine existing job descriptions.
3. Discuss with medical personnel the use and possible modification of pre-employment physicals.
4. Consider whether current pre-employment tests need to be eliminated or performed differently under the Act.
5. Begin to educate managers and co-workers about the introduction of disabled individuals into the work force.<sup>50</sup>

Government document criteria as well as ideas from the private sector will be incorporated into the research tool utilized.

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<sup>50</sup>Gavin Appleby, J.D., "The Coming of the ADA: Five Ways to Prepare Now," MT Today, September 1991, 14.

CHAPTER 3  
Methodology and Procedures  
Overview

Evaluation research using interviews, observations, and analysis of changes implemented is the methodology of choice for this study.

The ADA has several points with which one must comply. The points in Title I deal with discrimination during employment application and on the job. Employers are required to determine the essential functions of the positions in their facility and state these in job descriptions. An investigation was conducted to determine if this process had been completed and the time and expense involved in that process. A list of reasonable accommodations utilized by any disabled employees was compiled and analyzed to determine the cost to the facility.

Title III of the ADA deals with public accommodations and commercial facilities. Since the hospital facility is open to the public, it has parking, restrooms, elevators, telephones, restaurants, waiting areas, and treatment rooms utilized by the disabled while visiting as well as when using the medical services of the facility. These accommodations were reviewed to determine availability as well as the cost involved in implementation. It should be noted that the law has different requirements depending on whether one is dealing with an existing facility, new construction, or alterations to existing space.



It is felt that with good analysis and design a relatively inexpensive plan can be developed so a facility can fully comply with the intent of the law and avoid undue hardship.

### Description of Research Methodology and Design

The location of this study was the Medical Center at Bowling Green, an acute care hospital with 330 beds. The hospital is located in Bowling Green, a southcentral Kentucky city of approximately 40,640 population, with the surrounding Warren county population of approximately 76,670. The facility employs 1,224 professional and nonprofessional staff. Interviews were conducted throughout the facility with individuals responsible for Title I which typically falls under the Human Resources Department. Information obtained from the Human Resources Department along with interviews with department managers on action taken for compliance were analyzed.

Title III falls under the responsibility of the Physical Plant Manager and any individuals whose responsibilities include services used by the public. Thus, these managers were also interviewed. A physical survey was made of the facility to observe the extent of compliance. After the information was gathered, the cost of renovations and modifications was calculated to determine the economic effect on the facility.

### Instrumentation

Two checklists were used throughout the survey to gather and organize the data and to insure relevant and crucial information was tabulated. The Title I checklist (Appendix 1) was designed by the researcher based on

requirements of ADA. The checklist utilized for Title III (Appendix 2) was developed by the American Society for Hospital Engineering of the American Hospital Association and published in their text Complying with the Americans with Disabilities Act (ADA): A Guide for Health Care Facilities, and follows compliance mandates as defined in The Accessibility Guidelines for Building and Facilities (36 CFR Part 1191) by the Architectural and Transportation Barriers Compliance Board, an agency of the federal government. Permission for use of the checklist was obtained from the AHA Permissions Editor. Approval to survey The Medical Center at Bowling Green was obtained from the Executive Vice-President of Operations and the Vice-President of Human Resources/Marketing of the hospital.

CHAPTER 4  
Findings and Interpretations  
Title 1

Title I investigation was conducted through the Human Resources Department. The survey was broken down into five categories: job applications, job descriptions, general policies, disabled employees, and employee privileges. See appendix 1 for survey questions utilized. All activities for ADA had been completed by the time of the survey.

Job Applications:

Minor revisions were necessary to ensure job applications contained appropriate terminology and applicable questions. Any questions pertaining to medical problems or disabilities were deleted. Outdated forms were replaced when normal stock replacement was required; therefore, no additional costs were incurred.

Job Descriptions:

Extensive revisions were necessary to update job descriptions. Consultants were hired to educate department managers, one-on-one meetings were conducted by the Human Resources manager to explain the specific revisions to managers, and various key personnel attended workshops both within and outside the facility. Department managers revised each job description to state the essential functions and physical



requirements of the particular position. Since the facility employs 1,224 individuals in 300 different positions, the scope of the needed revisions was extensive.

General Policies:

The employee handbook required revision to remove any reference to handicap and insertion of "disabled" where appropriate.

Labor law manuals were obtained on audio tapes to assist job applicants. The tapes were obtained at no charge from the Equal Employment Opportunity Commission (EEOC).

Human Resources Department personnel are available to accommodate applicants as necessary during the application process.

Hospital leave of absence policies have always been flexible to allow sick time. Policies were reviewed, however, to ensure the disabled would be allowed time off for medical needs as necessary.

Disabled Employees:

The hospital currently has seven physically disabled employees who represent 0.6% of the staff. These employees work in nursing (nurses and aides), radiology, security, dietary, and human resources. No structural or equipment accommodations had to be provided. Actual accommodations included reassignment to non-patient nursing duties, shift change to eliminate a lifting requirement, use of a wheelchair, and assignment to clerical duties. Some disabled employees required no accommodations. These accommodations required no monetary expenditures from the facility.

Employee Benefits:

All employees regardless of disability receive the same privileges and benefits which include vacation, paid sick leave, annual physical exam, and annual social events. The Medical Center has not denied any requests for accommodations as of this date. Employee suggestions have assisted the facility in providing for the needs of employees.

Hospital sponsored events held off-site are evaluated for accessibility to the disabled. Events such as the 1993 Bowling Green Air Show provided handicap parking and accessible routes for the disabled. The 1993 Bowling Green Children's Classic race required the construction of an off-ramp for a participant at the finish line. That construction was provided at minimal expense to the facility.

Title I Action Areas:

Table 1 itemizes the costs based on each category discussed above, and Table 2 provides a detailed breakdown of cost components.

Table 1- Action Areas and Associated General Costs to Implement Title I.

ACTION AREAS	LINE COSTS	AREA COSTS
<b>Job Applications</b>		\$0.00
Revision and printing of new forms	\$0.00	
Audio tape of labor laws	\$0.00	
<b>Job Descriptions</b>		\$23,494.40
Labor by Human Resources to educate Department heads (1)	\$320.00	
Legal consultation with lawyer	\$200.00	
Revisions by each department (2)	\$10,500.00	
Review and clerical sorting by Human Resources (3)	\$120.00	
Educational consultation by Sunhealth representative	\$3,500.00	
Department managers training by Sunhealth consultant (4)	\$4,200.00	
Outside educational seminars on ADA	\$4,098.00	
Human Resources staff (5)	\$3,600.00	
Other staff (6)	\$498.00	
Printed educational material (7)	\$556.40	
<b>General Policies</b>		\$300.00
Employee handbook revisions (1,400 books)	\$300.00	
<b>Disabled Employees</b>		\$0.00
Accommodations for employees	\$0.00	
Litigation expenses	\$0.00	
<b>Disabled Employee Privileges</b>		\$150.00
Sponsored activities	\$150.00	
Parking at Bowling Green Air Show	\$0.00	
Ramp at Children's Classic Race (8)	\$150.00	
<b>TOTAL</b>		\$23,944.40

Note: See Table 2 for details of footnoted areas numbered 1-8.

Table 2- Details of Costs to Implement Title I.

DETAILS	LINE COSTS	DETAIL COSTS
<b>Job Descriptions</b>		
(1) Labor by Human Resources to educate Department heads:		\$320.00
16 hours at \$20.00/hr wage for Human Resources manager to inform Department heads of The Medical Center's requirements for job descriptions	\$320.00	
(2) Revisions by each department totalling 300 job descriptions:		\$10,500.00
One job description:	\$35.00	
0.5 hour at \$10.00/hr wage to survey physical requirements	\$5.00	
0.5 hour at \$20.00/hr wage to compile physical requirements	\$10.00	
1.0 hour at \$20.00/hr wage to write essential functions	\$20.00	
(3) Review and clerical sorting by Human Resources:		\$120.00
20 hours at \$6.00/hr wage clerical labor	\$120.00	
(4) Department managers training by Sunhealth consultant:		\$4,200.00
70 managers at \$20.00/hr wage for 3 hours	\$4,200.00	
Outside educational seminars on ADA:		\$4,098.00
(5) Human Resources staff:		
4 attendees to ADA conference in Atlanta, Georgia including air fare, lodging, meals, and registration fees	\$3,600.00	
(6) Other staff:		
1 attendee to ADA conference in Louisville, Kentucky including travel, lodging, meals, and registration fees	\$498.00	
(7) Printed educational material:		\$556.40
2 copies Complying with ADA: A Guide for Healthcare Facilities	\$137.90	
1 copy Compliance Guide to ADA	\$50.00	
1 copy What Managers and Supervisors Need to Know about ADA	\$18.50	
1 copy miscellaneous other textbooks and published materials	\$350.00	
<b>Disabled Employee Privileges</b>		
Sponsored activities:		
(8) Ramp at Children's Classic Race:		\$150.00
Accommodations for a participant including labor & materials	\$150.00	

### Title III

Survey forms from the American Hospital Association text Complying With the Americans With Disabilities Act (ADA): A Guide for Health Care Facilities were utilized to determine specific points of compliance under Title III of the ADA. The sections include all items required for accessibility to the services of the facility. Some survey forms were not applicable to the facility and therefore were not used. See Appendix 2 for survey questions used.

The ultimate goal of compliance with the ADA requires ongoing change. The following is a summary of items complete at this time. Subsequent sections will discuss scheduled future changes as well as the recommendations of the researcher.

#### Parking:

The Medical Center currently has 29 handicap designated parking spaces (five van accessible) out of a total 1,014 spaces. The law requires 20 spaces plus one for each 100 over 1,000. Based on this requirement the current number is adequate but not always located closely enough to the accessible entrances. These spaces are marked with a vertical sign visible over a parked vehicle and show the universal symbol of accessibility. The spaces are sufficiently wide and are generally located near accessible entrances.

#### Passenger Loading Zone:

Passenger loading zones are accessible. No steps are present. The loading area is flat with sufficient vehicle pull-up space. Curbs are stable,



firm, and slip resistant. Entrances have covers with sufficient vertical clearances for cars and vans. Curb ramps currently used appear to have correct slope. No changes have been implemented since the building of the facility. The new Out-Patient addition, constructed several years ago, was built to resemble the main entrance; therefore it is in compliance by similar design.

#### Pathways and corridors:

The pathways to and within the facility comply with the ADA. The pathways are sufficiently wide with no stairs or grade level changes. No protruding objects are present to obstruct movement. Overhead clearance is acceptable. Access to the skyway via elevator is acceptable. The signage is not acceptable, but discussion of this topic for the entire facility is discussed elsewhere.

#### Drinking Fountains:

No changes have been made to the drinking fountains within the facility. However, all areas with fountains have at least one in compliance. All fountains are out of the direct pathway, they allow a wheelchair user sufficient kneespace, the stream is at least 4 inches to allow cup insertion, and controls may easily be pushed with one hand.

#### Telephones and Communication Devices:

The facility is working diligently on complying with this portion of the ADA. A committee specifically targeting accommodations for people with sight and hearing problems recently made several recommendations which were implemented. The Medical Center at Bowling Green currently has six



Telecommunication Devices for the Deaf (TDD) available for use in the emergency areas, public areas, and patient rooms. The facility is in the process of permanently installing four additional devices on pay telephones in the emergency, out-patient, main lobby, and obstetrics waiting areas. The slow conversion for approximately 25% of patient rooms to volume controlled hand-sets is in progress. Three hearing aid compatible telephones are available for patient rooms as well as one pay telephone.

In addition to communication by telephone, it is recognized that other accommodations are needed by patients with sight or hearing impairments. The hospital has purchased Communicards, produced by the Patient Representative Department of the Mount Sinai Medical Center, New York, New York, which allow hearing impaired individuals to point quickly to an illustration to communicate health problems or needs. These cards are maintained in triage areas for use during emergencies.

Door knocker lights are available for use by hearing impaired to signal via a flashing light when someone knocks on the door. Similar to this device is the Signalman, made by American Telephone and Telegraph (AT&T), which allows the table lamp to flash when the telephone rings.

The hospital committee realized that a non-English speaking patient is also at a disadvantage. Therefore, the facility has purchased the AT&T Language Line which allows 24 hour a day service to provide translation service in 140 languages.

Closed caption television is also available in the public lobbies and can be installed as necessary in the hospital room of a hearing impaired patient.

### Entrances and Doors:

Main entrances to the facility have revolving doors. The main lobby entrance has an automatic door which was previously used as an emergency exit and was redesigned as a handicap accessible entrance. The main outpatient entrance has a revolving door with an automatic push door to the side. This door was installed specifically at the time of construction at additional expense. The side entrance to the out-patient area has an oversized revolving door through which wheelchairs and stretchers may pass. The emergency room entrance has an automatic door.

Interior doors to the facility are not all in compliance. New construction in the laboratory provides proper latches on the doors, but other areas have standard door knobs. These standard knobs do not provide one-handed operation without grasping or twisting the wrist.

### Lobbies:

All lobbies physically appear to comply with the law. There is an accessible route with sufficiently wide doorways and satisfactory head room. All barriers are cane detectable. The carpet is low pile and provides no hindrance to wheelchairs.

The signage in this area is not in compliance. See discussion of signage elsewhere.

### Elevators:

The elevators in the hospital meet the size requirements. The floors are adequate with no hazards. Emergency communication devices within elevators include an emergency call button and a telephone. No other

attempts have, as yet, been made to renovate or retrofit the elevators; thus, they currently do not comply. The deficiencies include the following:

1. No audible signal at each hoistway entrance to indicate whether up or down call is being answered.
2. There is no raised floor designation on each door jamb.
3. The elevator door does not remain fully open a minimum of three seconds.
4. The elevator control panel does not have contrasting numbers. However, they are raised and contain braille characters.
5. The button to the main lobby is not designated with a raised star.
6. Emergency buttons should be no lower than 35 inches from the floor. The current buttons are only 32 inches from the floor.

#### Rooms and Spaces:

General permanent rooms which include classrooms and the auditorium are regularly open to the public for meetings and classes. These areas are all on the main floor of the facility with no steps or barriers. Standard door knobs currently in use could prevent access for some individuals. Doors are sufficiently wide. Aisles and turnaround spaces are adequate. Seating is not fixed so that problems do not exist for wheelchair participants. All floors are satisfactory with no level changes.

Signage on these permanent rooms is unsatisfactory. This deficiency is addressed elsewhere. Light switches in all rooms and spaces are located at the appropriate height.

Patient hospital rooms are somewhat small in size but allow access for visitors. The furniture in patient rooms could be rearranged to allow

maximum access for a patient using a wheelchair. A limited, but sufficient, number of large semiprivate rooms are available for use if space is a problem.

#### Toilet Rooms:

Public and private bathrooms were surveyed separately. Public bathrooms off the main lobby did not comply with ADA. The restroom for women did not have an accessible toilet stall. The soap dispenser was not accessible. Drain pipes under the sinks were not insulated. The toilet seats were not the appropriate height. The bathroom for men at the same location had both toilet seats and a urinal at the wrong height. The drain pipes at the sinks were not insulated.

The two restrooms for public and out-patients, located in the newly renovated laboratory, are in compliance. The rooms are large with accessible sink and soap dispensers. Toilet seats are of appropriate height. Grab bars are in place. The sink drain pipes were not insulated.

The public restrooms in the new out-patient lobby were in compliance. No separate renovations of restrooms for ADA have occurred. All changes to make accessible bathrooms occurred during planned major additions or renovation to entire areas. The only unexpected expense was the minimal expense of grab bars which assist children and elderly as well as the disabled.

The restrooms in patient hospital rooms are narrow and would seem not to allow wheelchair access. Portable commodes are available, however.

### Bathtubs and Showers:

Most of the hospital floors that contain patient rooms have a community bathtub. These tubs are located in large accessible rooms, but the tubs themselves are not accessible. They are too tall, do not contain seats, and the shower spray unit is not always dual hand-held and fixed. Necessary grab bars are not present. The faucets are the twist type.

The showers in the patient rooms are 36 inches square. They do not permit room for a wheelchair to roll in, and they are not transfer type shower stalls since no seat is available. Additionally, each stall has an approximate four inch concrete curb prohibiting access.

### Cafeteria:

The snack area and cafeteria were renovated just prior to ADA. The main pathway is accessible. The food service lines are sufficiently wide and slide trays meet the requirements at 34 inches above the floor. Self-service shelves are accessible. The buttons on the soda fountain are high, but cafeteria staff are available to assist as necessary.

The majority of the seating is not fixed, so it is relatively easy to accommodate a wheelchair. The tables allow proper approach space and knee clearance. No changes are required in this area.

### Signs:

Signs are utilized throughout the facility. The signs have a brass background with black letters which can make the signs difficult to read for some people. The letters are not raised and do not contain braille. The

hospital owns the equipment to make signs and recently purchased the computer software necessary to redo all signs on permanent areas.

Title III Action Areas:

Table 3 itemizes the costs based on each category discussed above and Table 4 provides a detailed breakdown of cost components.



Table 3- Action Areas and Associated General Costs to Implement Title III.

ACTION AREAS	LINE COSTS	AREA COSTS
<b>Parking</b>		\$1,742.00
Handicap Signs (1)	\$1,450.00	
Labor and materials for sign installation (2)	\$292.00	
<b>Doors and Entrances</b>		\$52,120.00
Automatic door openers (3)	\$50,000.00	
Accessible front door	\$1,400.00	
Latch handles (4)	\$720.00	
<b>Telephone and Miscellaneous Equipment</b>		\$15,440.00
Telecommunication Device for the Deaf, TDD (5)	\$3,000.00	
TDD for public pay telephones (6)	\$4,800.00	
Volume control handsets (7)	\$3,250.00	
Hearing aid compatible telephones (8)	\$300.00	
Communicards™ (Mt. Sinai Medical Center, NY) (9)	\$120.00	
AT&T language line (10)	\$1,000.00	
Closed caption television (11)	\$2,400.00	
Door knocker lights (12)	\$300.00	
Signalman™ (AT&T) lamp/telephone (13)	\$270.00	
<b>Signs</b>		\$3,500.00
Computer software update	\$3,500.00	
<b>TOTAL</b>		\$72,802.00

Note: See Table 4 for details of footnoted areas numbered 1-13.

Table 4- Details of Costs to Implement Title III.

DETAILS	LINE COSTS	DETAILS COSTS
<b>Parking</b>		
(1) Handicap Signs: 29 at \$50.00 each		\$1,450.00
(2) Labor and materials for sign installation:		\$292.00
0.5 hour at \$15.00/hr wage per 29 locations	\$217.00	
Materials including paint and brushes	\$75.00	
<b>Doors and Entrances</b>		
(3) Automatic door openers: 25 at \$2,000.00 each		\$50,000.00
(4) Latch handles:		\$720.00
with lock: 4 at \$140.00 each	\$560.00	
without lock: 2 at \$80.00 each	\$160.00	
<b>Telephone and Miscellaneous Equipment</b>		
(5) Telecommunication Device for the Deaf, TDD: 4 at \$500.00 each		\$3,000.00
(6) TDD for public pay telephones: 4 at \$1,200.00 each		\$4,800.00
(7) Volume control handsets: 50 at \$65.00 each		\$3,250.00
(8) Hearing aid compatible telephones: 3 at \$100.00 each		\$300.00
(9) Communicards™ (Mt. Sinai Medical Center, NY):		\$120.00
General cards: 6 at \$10.00 each	\$60.00	
Heart specific cards: 6 at \$10.00 each	\$60.00	
(10) AT&T language line:		\$1,000.00
Initial service line hookup	\$400.00	
Annual line usage fee: 12 months at \$50.00 per month	\$600.00	
(11) Closed caption television: 6 at \$400.00 each		\$2,400.00
(12) Door knocker lights: 6 at \$50.00 each		\$300.00
(13) Signalman™ (AT&T) lamp/telephone: 6 at \$45.00 each		\$270.00

### Title I and III Compliance Recommendations

#### Title I:

Only one recommendation is suggested to comply with Title I of the ADA. Training of managers, although not required by ADA, would be advantageous. The opportunity for supervisors and managers to learn how best to integrate the disabled employee into their work areas would be beneficial. Further education of non-disabled employees by managers could prevent conflicts and morale problems in the future. Education is felt an important part to successful compliance with Title I.

#### Title III:

Following are recommendations that would enable the facility to move toward the goal of total compliance with Title III. The estimation and explanation of costs associated with these recommendations is found in Table 5 and Table 6, respectively.

#### Parking:

The addition of parking spaces for the disabled in the new parking lots located near the out-patient entrance would improve access. Additionally, the parking lot adjacent to the emergency entrance needs the disabled parking slot lined and requires the installation of a vertical, overhead, parking sign.

#### Passenger Loading Zone:

Handicap access signs at the main entrances need to be large and visible for easy identification. This change can be accomplished when new signs are made throughout the facility.

The curb ramp leading to the handicap accessible door at the front entrance needs the flared edges smoothed. The ramp is a potential safety hazard to non-disabled pedestrians.

Elevators:

The elevators do not comply with the ADA. Several items need addressing:

1. No audible signal at each hoistway entrance to indicate whether up or down call is being answered.
2. There is no raised floor designation on each door jamb.
3. The elevator door does not remain fully open a minimum of three seconds.
4. The elevator control panel does not have contrasting numbers. However, they are raised and contain braille characters.
5. The button to the main lobby is not designated with a raised star.
6. Emergency buttons should be no lower than 35 inches from the floor. The current buttons are only 32 inches from the floor.

The recommendations and the projected costs are based on a cost quotation from the manufacturer of the elevators.

Signage:

The signs throughout the facility do not comply. The background and letters do not have the proper contrast, letters are not raised, and Braille characters are not present. All signs should be redone and installed to comply with the requirements of the ADA.

Rooms and Spaces:

It is recommended that a wheelchair patient be allowed to utilize a semiprivate room as a "private room" whenever a regular private room proves inaccessible.

Toilet Rooms:

It is recommended that the main lobby restroom for women have one commode removed and the stall enlarged to comply with ADA. It is also recommended that the soap dispenser be moved and the drain pipes at the sink be insulated. Toilet seats should be placed at the recommended height. The restroom for men at the same location needs the height of the toilet seat and urinal lowered.

Bathtubs and Showers:

Since community bathtubs and showers in patient rooms are not accessible, it is recommended that all community tub rooms be renovated to include low, accessible, bathtubs, and roll-in showers.

Table 5- Action Areas and Associated Projected General Costs to Implement Fully Title III.

ACTION AREAS	LINE COSTS	AREA COSTS
<b>Parking</b>		\$302.50
Addition of three handicap spaces (1)	\$182.50	
Passenger loading zone (2)	\$120.00	
<b>Doors</b>		\$7,400.00
Latch handle replacement (3)	\$3,400.00	
Addition of two automatic doors (4)	\$4,000.00	
<b>Elevators</b>		\$20,928.00
Upgrade of eight existing (5)	\$20,928.00	
<b>Signs</b>		\$7,800.00
Replace 1,000 existing signs (6)	\$7,800.00	
<b>Bathrooms, Main Lobby</b>		\$758.75
Renovate two bathrooms (7)	\$758.75	
<b>Bathtubs and Showers, Community in Patient Areas</b>		\$10,000.00
Renovate ten community bathtubs and showers (8)	\$10,000.00	
<b>TOTAL</b>		\$47,189.25

Note: See Table 6 for details of footnoted areas numbered 1-8.



Table 6- Details of Projected Costs to Implement Fully Title III.

DETAILS	LINE COSTS	DETAIL COSTS
<b>Parking</b>		
(1) Addition of three handicap spaces:		\$182.50
3 handicap signs at \$50.00 each	\$150.00	
0.5 hours labor for installation at \$15.00/hr wage per 3 spaces	\$22.50	
Materials including paint and brushes	\$10.00	
(2) Passenger loading zone:		\$120.00
Curb ramp renovation:		
3.0 hours labor at \$15.00/hr wage	\$45.00	
Materials	\$75.00	
<b>Doors</b>		
(3) Latch handle replacement:		\$3,400.00
with lock: 10 minimum at \$140.00 each	\$1,400.00	
without lock: 25 minimum at \$80.00 each	\$2,000.00	
(4) Addition of two automatic doors: 2 at \$2,000.00 each		\$4,000.00
<b>Elevators</b>		
(5) Upgrade of eight existing:		\$20,928.00
All labor and materials:		
Jamb mounted Braille plates		
Floor passing and double down gongs		
Car station Braille plates		
ADA compliant telephones		
<b>Signs</b>		
(6) Replace 1,000 existing signs:		\$7,800.00
Materials: \$4.80 per 6x12 inch sign per 1,000 signs	\$4,800.00	
0.2 hours labor at \$15.00/hr wage per 1,000 signs	\$3,000.00	
<b>Bathrooms, Main Lobby</b>		
(7) Renovate two bathrooms:		\$758.75
0.25 hours labor to move soap dish at \$15.00/hr wage	\$3.75	
0.25 hours labor to wrap pipes at \$15.00/hr wage per 4 sinks	\$15.00	
Pipe wrap materials: \$10.00 per 4 sinks	\$40.00	
Lower urinal: labor and materials	\$200.00	
Lower commode and increase stall size: labor and materials	\$500.00	
<b>Bathtubs and Showers, Community in Patient Areas</b>		
(8) Renovate ten community bathtubs and showers:		\$10,000.00
10 at \$1,000.00 each	\$10,000.00	
<b>TOTAL</b>		\$47,189.25

## CHAPTER 5

### Summary

Compliance with the Americans With Disabilities Act is required. This legislation provides access to employment and public services for disabled members of society. The Equal Employment Opportunity Commission expected 12,000 complaints the first year for violations against Title I. The American Hospital Association estimated hospitals would spend \$20 million dollars within the next decade to comply with Titles I and III. Significant penalties follow confirmation of violations against ADA; therefore, it is imperative that businesses comply.

A survey of The Medical Center at Bowling Green revealed \$96,746.40 spent to date to comply with Titles I and III of ADA and conservative projected expenditures of \$47,189.25. The total cost of compliance would be \$143,935.65. See Table 7.

Table 8 depicts the distribution of expenditures by actual dollars and percentage for the major categories surveyed for both titles. This data is beneficial to other managers undertaking a survey of their facility. A basic idea of the relative distribution of costs would facilitate planning and budgeting.

The actual expenditure of \$96,746.40 was only 0.13% of the total expenses of \$73.4 million for the facility. Projected expenditures for ADA of \$47,189.25 would represent 0.06% of the \$73.4 million total expense level of the hospital in 1992.

The actual cost per bed to date is \$293.17. Research showed a median expenditure of \$600 per bed for other facilities to comply with the ADA. The Medical Center is within range, but still well below the median. If the recommendations for compliance are completed, then based on projected costs, the expenditure per bed would increase to \$436.17, a value still below the median.

The actual expenditures for ADA compliance are approximately 0.23% of the cost of an admission in 1992. The actual expenditures for ADA compliance calculate to be 0.13% of the total revenue of \$74.5 million for 1992. The ADA expenditures for only Title III are 1.7% of the 1992 investment in property, plant, and equipment.

Table 7- Title I and III Cost Calculations.

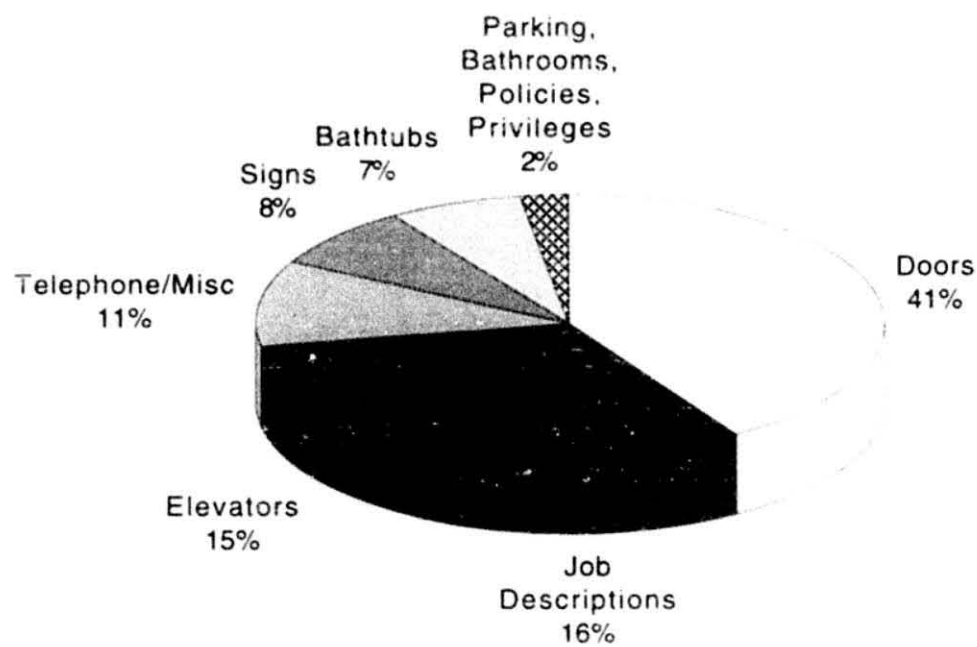
ADA Compliance Area	COSTS			
	Actual	Projected	Total	% Total
Title I	\$23,944.40	\$0.00	\$23,944.40	16.6
Title III	\$72,802.00	\$47,189.25	\$119,991.25	83.4
Titles I and III Total Costs	\$96,746.40	\$47,189.25	\$143,935.65	100.0

1992 Statistics	
Beds	330
Patient Days	71,496
Admissions (ADM)	10,820
Outpatient (OP) Visits	26,251
Emergency Room (ER) Visits	28,968
Patients (ADM, OP, ER)	66,039

ADA Compliance Area	COSTS PER :			OP	ER	Patient
	Bed	Patient Day	Admission	Visit	Visit	
Title I	\$72.56	\$0.33	\$2.21	\$0.91	\$0.83	\$0.36
Title III	\$363.61	\$1.68	\$11.09	\$4.57	\$4.14	\$1.82
Titles I and III Total Costs	\$436.17	\$2.01	\$13.30	\$5.48	\$4.97	\$2.18

Table 8- Relative Distribution of Costs for ADA Compliance.

COST AREA	COST	% TOTAL
Doors	\$59,520.00	41.4
Job Descriptions	\$23,494.40	16.3
Elevators	\$20,928.00	14.5
Telephones/Misc	\$15,440.00	10.7
Signs	\$11,300.00	7.9
Bathtubs	\$10,000.00	6.9
Parking	\$2,044.50	1.4
Bathrooms	\$758.75	0.5
Policies	\$300.00	0.2
Disabled Privileges	\$150.00	0.1
TOTAL	\$143,935.65	100.0



### Conclusion

While raw data depicting costs per patient day or admission makes the expenditures for ADA appear noteworthy, the significance declines when depreciated over time and divided evenly among all patients. Since the majority of costs to comply with ADA occur as a result of requirements of Title III for physical facilities, these costs could be depreciated over about a ten year period. This depreciation reduces the financial impact by essentially tenfold per admission or patient.

Adding the number of inpatient admissions plus outpatient and emergency room visits provides a total number of patients seen annually by the hospital. If the costs of ADA were distributed equally to these 66,039 patients, then the impact to patient costs would be \$2.17 per patient over one year. Assuming no change in patient volume, the impact to patient costs over 10 years would be \$0.21 per patient.

The conclusions drawn from the analysis of the cost information would support the hypothesis that practical and relatively inexpensive solutions are achievable allowing a facility to comply fully with the intent of the law. The hypothesis is accepted.

It should be noted that each facility is different in design, age, and financial status. The researcher feels The Medical Center at Bowling Green represents an average facility with a bed size of 330 and an age of 14 years.



### Recommendations

The researcher recommends renovation to correct the deficiencies listed in Chapter 4. These changes coupled with the items already changed by The Medical Center at Bowling Green should allow the facility to provide successfully an opportunity for employment and access to public services for the disabled.

APPENDIX 1  
TITLE I  
EMPLOYMENT PROVISIONS

<b>JOB APPLICATIONS</b>		
Do current job applications make inquiries concerning:		
Applicant's medical history	Y	N
Applicant's possession of a disability	Y	N
Applicant's Worker's Compensation experience	Y	N
Health of applicant's family or associates	Y	N
Have application forms been updated for ADA	Y	N
Revision time		
Revision cost		
Have personnel policies been discontinued in order to comply with the ADA	Y	N
Define policy changes		
Time involved in changes		
\$ amount of savings or expenditure involved in change		
Have accommodations been made for disabled applicants	Y	N
\$ amount expended		
<b>JOB DESCRIPTIONS</b>		
Have position descriptions been rewritten to state the essential functions of the job?	Y	N
Man-hours required by individual to educate those who perform rewrites		
Time required by individual departments to rewrite		
Cost of total man-hours involved in rewriting job descriptions		
Cost of consultants involved in ADA education		
Total number of individuals trained by consult		
Total man-hours involved in training		
Total cost of man-hours involved in the training		
Additional instruction costs (i.e. materials, etc.)		
Was there attendance at outside seminars	Y	N
Man-hours involved		
Total cost of man-hours		
Total cost of seminars		
<b>GENERAL POLICIES</b>		
Have policies been revised to state compliance	Y	N
Total manhours spent performing revision		
Total expense of man-hours		
Total expense of printed materials for policy change		
Are managers and employees trained on the requirements of the law	Y	N

<b>DISABLED EMPLOYEES</b>		
Current number of disabled employees		
Positions held		
Reasonable accommodations required by these disabled employees to perform the essential functions of the job		
Cost of accommodations		
Have requests for accommodations been denied based on cost or potential danger to other employees	Y	N
Explain		
Have there been any complaints from disabled applicants or employees resulting from lack of cooperation or accommodation	Y	N
Explain		
Expenses involved in resolving complaints		
<b>DISABLED EMPLOYEE PRIVILEGES</b>		
Do disabled employees have availability/access to job related privileges equal to non-disabled	Y	N
Do disabled employees receive equal employee benefits	Y	N
Do disabled employees use greater than average sick days	Y	N
Are company social events held in accessible locations	Y	N
Are outside, hospital-sponsored professional meetings held in accessible locations	Y	N

## SURVEY FORM 1: PARKING

Facility Name: \_\_\_\_\_

Parking Lot Location: \_\_\_\_\_

# of Spaces Provided: \_\_\_\_\_

# Required to be Accessible: \_\_\_\_\_

Total Parking  
in LotRequired Min. #  
of Accessible Spaces

1 to 25	1
26 to 50	2
51 to 75	3
76 to 100	4
101 to 150	5
151 to 200	6
201 to 300	7
301 to 400	8
401 to 500	9
500 to 1000	*
1001 & over	**

\* 2 percent of total

\*\* 20 plus 1 for each 100 over 1000

	Yes	No	N/A
4.1.2(5a) Are the required number of accessible parking spaces provided? (Note: The total number of accessible parking spaces may be distributed among parking lots if greater accessibility is achieved.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.6.2 Are accessible parking spaces the closest spaces to the building's accessible entrance?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If a parking facility serves more than one building or public space, are the accessible parking spaces the closest spaces to the parking facility's accessible pedestrian entrance?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.6.3 Are accessible parking spaces at least 96 inches wide with a demarcated adjacent access aisle of 60 inches? (Two spaces may share a common aisle.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.1.2(5b) If the parking space is designated as a van space, is the adjacent aisle at least 96 inches wide? (One in every eight accessible spaces is required to be designated "van accessible.")	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are the spaces and aisles level with no slope greater than 1:50? (This means a curb ramp cannot project into the access aisle.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.6.5 Do parking spaces designated as van spaces have a vertical clearance of at least 98 inches?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.6.4 Does each accessible parking space have a vertical sign that is unobscured by a parked vehicle and shows the universal symbol of accessibility?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.1.2(7)			

# SURVEY FORM 2: PASSENGER LOADING ZONE

Facility Name:

☐ Accessible Passenger Loading Zone Provided

Passenger Zone Location:

☐ Accessible Passenger Loading Zone Not Provided

		Yes	No	N/A
4.1.2(7)	Is there a sign displaying the international symbol of accessibility at the passenger loading zone?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.6.6	Is there a pedestrian aisle parallel to the vehicle pull-up space?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the pedestrian aisle at least 5 feet wide by 20 feet long?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is there a curb between the pedestrian aisle and the vehicle space, is there a curb ramp?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the pedestrian aisle level, with no slope greater than 1:50?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the vehicle pull-up space level, with no slope greater than 1:50?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.6; 4.5.1	Is the pedestrian aisle and parking surface stable, firm and slip-resistant?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.7.2	Is the slope of the curb ramp 1:12 or less?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the transition from the curb ramp to the walkway, road or gutter flush and free of abrupt changes?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are the slopes of the road, gutter or accessible route adjoining the ramp no greater than 1:20?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.7.3	Is the width of the curb ramp, not include the flared sides, at least 36 inches?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.7.4;4.5.1	Is the surface of the curb ramp stable, firm and slip-resistant?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.7.5	If the curb ramp is located where pedestrians might walk across it and if it is not protected by handrails, does it have flared sides?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Do these flared sides have a slope of 1:10 or less?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If sharp return curb cuts are present, is pedestrian cross traffic prohibited by walls, guardrails, shrubbery or other elements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.7.6	Do built up curb ramps not project into vehicular traffic lanes?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.7.8	Are curb ramps located or protected so that they will not be obstructed by parked vehicles?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

- |       |  | Yes                   | No                    | N/A                   |
|-------|--|-----------------------|-----------------------|-----------------------|
| 4.5.4 | Is the smaller dimension of grating openings no more than 1/2 inch, and are long dimensions of rectangular gaps placed perpendicular to the usual direction of travel? | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
| 4.6.5 | Is there at least 114 inches vertical clearance along the vehicle route to the passenger loading zone?   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |
|       | Is there at least 114 inches vertical clearance at the passenger loading zone?   | <input type="radio"/> | <input type="radio"/> | <input type="radio"/> |



# **SURVEY FORM 3: PATHWAYS**

**Facility Name:**

**Accessible Route to be Surveyed**

**From:**

**To:**

		Yes	No	N/A
4.3.2(1)	Is there an accessible route within the boundary of the site linking public transportation stops and the accessible building entrance?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is there an accessible route linking accessible parking and passenger loading zones with the accessible building entrance?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is there an accessible route linking public streets and sidewalks with the accessible building entrance?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.2(2)	Is there an accessible route connecting accessible buildings, facilities, elements and spaces on the same site?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.8	Is the accessible pathway free of steps and stairs?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.3	Is the accessible pathway at least 36 inches wide?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Where the accessible pathway makes a U-turn around an obstacle less than 48 inches wide, does the pathway width increase to at least 42 inches on the approach and 48 inches in the turn? (Figures 3&7)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.4	If the pathway is less than 60 inches wide, are there passing spaces at least 60 inches wide and 60 inches long at reasonable intervals not exceeding 200 feet (Figure 4)?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.5; 4.4.2	Is there at least 80 inches clear head room along the pathway?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If head room is less than 80 inches in a space next to an accessible pathway, is there a cane detectable barrier within 27 inches of the ground?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.4.1	If objects mounted to the wall have bottom edges between 27 and 80 inches from the floor, do they project less than 4 inches into the pathway? (Wall-mounted objects with bottom edges below 27 inches may project any amount so long as they do not reduce the required clear width of an accessible route of travel)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If an object mounted on a post (such as a sign or a telephone) has a bottom edge between 27 and 80 inches from the ground, does the object project less than 12 inches into the path of travel?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the accessible pathway at least 36 inches wide alongside the protruding object?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

		Yes	No	N/A
4.1.2(7) 4.30.2	On signs, do the letters and numbers have a width-to-height ratio between 3:5 and 1:1, and a stroke width-to-height ratio between 1:5 and 1:10?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.30.5	Do the characters and symbols contrast light/dark with their background?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are characters or background eggshell in color?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.1.2(7); 4.30.4	On permanent signage which identifies rooms and spaces, are the characters in sans serif or simple serif font?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are the characters and symbols on signs raised at least 1/32 inches?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are the raised characters or symbols between 5/8 inches and 2 inches tall?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.5.1	Are accessible pathway surfaces stable, firm and slip-resistant?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.5.4	Is the smaller dimension of grating openings no more than 1/2 inch, and are long dimensions of rectangular spaces placed perpendicular to the usual direction of travel?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.7	Is the slope of the accessible pathway no greater than 1:20?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the cross slope of accessible pathway no greater than 1:50?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.8; 4.5.2	When walkway levels change, is the vertical difference between them less than 1/4 inch?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If there is a change in level of between 1/4 inch and 1/2 inch anywhere on the accessible route, is the edge beveled with a slope of 1:2?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are changes in level greater than 1/2 inch ramped?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.7.11	Where an accessible pathway crosses an island, is the island cut through at street level? OR Are there curb ramps on both sides and a level area at least 48 inches long between them?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.7.1	Is there a curb ramp wherever an accessible pathway meets a curb?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.7.8	Are curb ramps located or protected so that they will not be obstructed by parked vehicles?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.7.9	Are curb ramps at crosswalks wholly contained within the crosswalk lines, except for the flared sides?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

		Yes	No	N/A
4.7.2	Is the slope of the curb ramp 1:12 or less?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the transition from the curb ramp to the walkway, road or gutter flush and free of abrupt changes?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are the slopes of the road, gutter and accessible route at the top and bottom of the ramp no greater than 1:20?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.7.3	Is the width of the curb ramp, not including the flared sides, at least 36 inches?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.7.4	Is the surface of the curb ramp stable, firm and slip-resistant?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.7.5	If the curb ramp is located where pedestrian must walk across it and it is not protected by handrails, does it have flared sides?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Do the flared sides have a slope of 1:10 or less?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.7.6	Are built-up curb ramps located so that they do not project into vehicular traffic lanes?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.7.10	If diagonal (or corner-type) curb ramps have well-defined edges, are these edges parallel to the pedestrian traffic flow?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is there a minimum of 48 inches clear space within the crosswalk lines at the bottom of a diagonal curb ramp?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If the diagonal curb ramp has flared sides, does it have a minimum 24-inch segment of straight curb located on each side of the curb ramp within the crosswalk lines?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.9	Do doors on the accessible route provide a minimum clear opening of 32 inches? Refer to survey for 11 for more details.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.10	Can the accessible route serve as a means of egress in an emergency?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Does the route connect to an accessible area of rescue in nonsprinklered buildings? Refer to survey form 4 for specific details on areas of rescue assistance.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

# SURVEY FORM 5: DRINKING FOUNTAINS

Facility Name:

Fountain Location:

4.1.3(10) Drinking Fountains and Water Coolers:  
If drinking fountains are provided, then at least 50% but not less than one shall meet the following recommendations.

		Yes	No	N/A
4.15.5(2)	If the unit is freestanding or built-in and does not have a clear space underneath it, does it have a clear floor space alongside it at least 30 by 48 inches which allows a wheelchair user to make a parallel approach (Figure 27)?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.15.5(1)	If the unit is wall- or post-mounted, is there a clear knee space between the bottom of the apron and the ground which is at least 27 inches high, 30 inches wide and 17 inches deep?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.4.1	If a wall-mounted drinking fountain has a bottom edge between 27 and 80 inches from the floor, does it project less than 4 inches into the pathway? (Wall-mounted fountains with bottom edges at or below 27 inches may project any amount so long as the required clear width of an accessible route or travel is not reduced.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.15.2	Is the spout outlet no higher than 36 inches from the ground?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.15.3	Is the spout at the front of the unit, with a water flow parallel or nearly parallel to the front edge?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the water stream at least 4 inches high to allow the insertion of a cup under the stream?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.15.4	Are the controls front-mounted or side-mounted and located near the front edge?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.15.4; 4.27	Are the controls operable with one hand?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are they operable without tight grasping, pinching or twisting of the wrist?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

# **SURVEY FORM 6: TELEPHONES**

**Facility Name:**

**Telephone Location:**

Telephones Provided:

1 or more single units

1 bank

2 or more banks

Accessible Telephones:

1 per floor

1 per floor

1 per floor

		Yes	No	N/A
4.31.9	Are pay telephones adaptable to accept a portable text telephone or text telephone is permanently installed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.31.1; 4.1.3(17)	Are accessible phones provided as stated above, which meets the following requirements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.4.1	If a wall-mounted telephone has bottom edges between 27 and 80 inches from the floor, does it project less than 4 inches into the pathway? (Wall-mounted telephones with bottom edges at or below 27 inches may project any amount so long as the required clear width of an accessible route or travel is not reduced.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If a telephone is mounted on a post with bottom edges between 27 and 80 inches high, does it project less than 12 inches into the route of travel?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is there an accessible path of at least 36 inches wide alongside the telephone?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.31.2; 4.2.4	Does the accessible phone have a 30 by 48 inch clear ground space that allows either a forward or parallel approach by a person using a wheelchair?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.31.3; 4.2.5; 4.2.6	If the clear ground space allows only a forward approach, then is the highest operable part of the phone no more than 48 inches from the ground?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If the clear ground space allows only a side approach to the telephone, then is the highest operable part of the telephone no more than 54 inches from the ground?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.31.7	Are telephone books also within these reach ranges?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.31.5	Is volume control between 12 dbA and 18 dbA provided on the telephone?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.31.6	Does the telephone have pushbutton controls unless such service is unavailable?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.31.8	Is the cord from the telephone to the handset at least 29 inches long?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.31.9	Are text telephones provided at pay phones or is pay phone adaptable to accept portable text telephone?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



## SURVEY FORM 10: ENTRANCES

Facility Name:

Entrance Location:

		Yes	No	N/A
4.14.2	Is the accessible entrance to the building <b>not</b> a service entrance unless the <b>only</b> entrance to the building is a service entrance?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.14.1	Within the boundaries of the site, is the accessible entrance connected by an accessible route to existing public transportation stops, accessible parking and passenger loading zones, and to public streets or sidewalks?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the accessible entrance connected by an accessible route to all accessible elements or spaces within the building or facility?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.14.1; 4.3.8	If there is a vertical level change between 1/4 inch and 1/2 inch at or along route to the entrance, is the edge beveled with a slope of 1:2 or less?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If there is a vertical level change greater than 1/2 inch at the entrance, is it treated with a curb ramp or ramp?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.13.2	If turnstiles or revolving doors are used on an accessible route, is there an accessible gate or door provided to facilitate the same use pattern?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.13.3	Do all gates including ticket gates meet all the applicable specifications for doors? Refer to survey form 11 for specific details on doors and gates?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



# **SURVEY FORM 11: DOORS AND GATES**

**Facility Name:**

**Door Location:**

		Yes	No	N/A
4.13.2	If a revolving door or turnstile is used on an accessible route, is an accessible door or gate provided to facilitate the same use pattern?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.13.3	Do all gates including ticket gates meet all the applicable specifications for doors?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.13.4	If the doorway has two independently operated door leaves, does at least one active leaf provide a 32-inch clear opening width and maneuvering space as shown in Figure 25?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.13.5	When a door is open 90 degrees, is there a clear opening at least 32 inches measured between the face of the door and the door stop on the latch side?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If the door does not require full user passage, such as a shallow closet, is the clear opening at least 20 inches?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.13.6	If the door is not automatic or power assisted, does it have maneuvering space relative to the direction of approach as shown in Figure 25?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the floor level and clear within the required maneuvering space?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.13.7	If there are two doors in series, is the clear space between the walls at either end of the vestibule at least 48 inches plus the width of the door?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Do the doors in the series swing in the same direction?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	OR			
	Do they swing away from the space between them?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.13.8	If there is a raised threshold, is it beveled at 1:2 or less?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the threshold no higher than 1/2 inch? (Exception: An exterior sliding door can have a 3/4-inch threshold.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.13.9	Are all handles, locks and latches operable with one hand?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are they operable without tight pinching, tight grasping or twisting of the wrist?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Yes	No	N/A
4.13.10			
4.13.11			
4.13.12			

## SURVEY FORM 12: BUILDING LOBBIES AND CORRIDORS

**Facility Name:**

**Lobby and Corridor Location:**

		Yes	No	N/A
4.13.10; 4.13(8)	If more than one means of egress is required by the fire code, is more than one accessible? (All accessible routes must serve as means of egress or connect to areas of rescue assistance in nonsprinklered buildings.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.2(3)	Is there an accessible route connecting the accessible entrance with all accessible elements, spaces and dwelling units within the building?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.3	Is the accessible route at least 36 inches wide except at doorways?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are doorways at least 32 inches in clear opening width?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.3	Where the accessible route makes a U-turn around an obstacle which is less than 48 inches wide, does the pathway width increase to at least 42 inches on the approach and 48 inches in the turn? (Figure 7)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.4	If the accessible route is less than 60 inches wide, are there passing spaces at least 60 inches wide and 60 inches long within reasonable intervals not exceeding 200 feet?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.4.1	If objects mounted to the wall have bottom edges between 27 and 80 inches from the floor, do they project less than 4 inches into the space? (Wall-mounted objects with bottom edges below 27 inches may project any amount so long as they do not reduce the required clear width of an accessible route of travel.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Do freestanding objects mounted on posts with bottom edges between 27 and 80 inches high project less than 12 inches into the route of travel?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is there an accessible path of at least 36 inches clear alongside the protruding object?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.4.2	Is there at least 80 inches clear head room?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If there is less than 80 inches clear head room in an area adjoining an accessible route, is there a barrier to warn visually-impaired persons?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the barrier within 27 inches of the ground so that it is cane-detectable?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.5.1	Are the floors in all accessible areas and routes stable, firm and slip-resistant?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Yes	No	N/A
4.3.8; 4.5.2 Are changes of level greater than 1/2 inch treated with a ramp?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are changes in level between 1/4 inch and 1/2 inch beveled with a slope no greater than 1:2?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Where floor materials change, does the vertical difference between them stay within these change of level requirements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.5.3 If carpet or carpet tile is used on the floor, is it securely attached?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is carpet pile thickness 1/2 inch or less?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is it a level, low pile type of carpet with a firm pad or no pad at all underneath it?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.7 Is the slope of the route no greater than 1:20 except at ramps?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the cross slope no greater than 1:50?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.13.2 If turnstiles or revolving doors are used on an accessible route, is there an accessible gate or door provided to facilitate the same use pattern?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.13.3 Do all gates including ticket gates meet all the applicable specifications for doors?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.1.2(7); 4.30.2 On signs, do the letters and numbers have a width-to-height ratio between 3:5 and 1:1, and a stroke width-to-height ratio between 1:5 and 1:10?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.30.5 Do the characters and symbols contrast with their background, and is one or the other eggshell in color?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.30.4; 4.12(7) Are signs for permanent rooms and spaces raised 1/32", upper case, sans serif or simple serif font, and 5/8" to 2" in height?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

# **SURVEY FORM 13: ELEVATORS**

**Facility Name:**

**Elevator Location:**

Each passenger elevator serving more than 3 levels in a multi-story building or facility must comply with 4.10. Freight elevators are to be surveyed if the only elevators provided are combination passenger and freight elevators used by the public. (4.1.3(5))

		Yes	No	N/A
<b>Hallway Call Buttons:</b>				
4.10.3	Are the hallway call buttons centered at 42 inches above the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are the call buttons at least 3/4 inches in the smallest dimension?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Do they have visual signals to indicate when each call is registered and answered?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the button designating the up direction above the down button?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are the buttons raised or flush with the wall?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If there is an object below the buttons, does it project no more than 4 inches into the elevator lobby?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.10.4	Is there a visible and audible signal at each hoistway entrance to indicate which car is answering a call?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Do audible signals sound once for up and twice for down, or do they have verbal annunciators that say "up" or "down"?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are the visual signals:			
	• mounted at least 72 inches above the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	• at least 2½ inches in the smallest dimension?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	• visible from the vicinity of the hall call button?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<b>Door Jamb and Threshold:</b>				
4.10.5	Does each elevator hoistway entrance have a raised floor designation on each door jamb centered 60 inches from the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are these figures 2 inches tall?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.10.5; 4.30	Do the numbers on the floor designation sign have a width-to-height ratio between 3:5 and 1:1?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Do they have a stroke width-to-height ratio between 1:5 and 1:10?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Does the color of the numbers contrast with the color of the background and is one or the other eggshell in color?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are the numbers raised at least 1/32 of an inch?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



		Yes	No	N/A
	Are the numbers in upper case sans serif or simple serif font?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.10.2	Does the floor of the elevator car come within 1/2 inch of the hallway floor at each stop?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.10.9	Is the horizontal gap between the car floorplatform and the landing edge no greater than 1 1/4 inches?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Doors:</u>				
4.10.6	Do the elevator doors open and close automatically?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Do they reopen automatically without contact if they become obstructed by an object between 5 inches and 29 inches above the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.10.7	Is the time from when the elevator's arrival is signaled until the doors begin to close at least 5 seconds?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If any hoistway door is further than 7.5 feet from the hall call button, does the time increase according to Figure 21?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.10.8	Do the elevator doors remain fully open for a minimum of 3 seconds?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Elevator Floor:</u>				
4.10.9	Does the floor area of the car allow maneuvering room for wheelchair users to enter the car, reach the controls and exit? (Figure 22)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.5.1	Are the floors in and adjacent to the elevator stable, firm and slip-resistant?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.10.11	Is the illumination level at the car controls, the platform and the car threshold and landing sill at least 5 footcandles?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Elevator Control Panels:</u>				
4.10.12	Are the control buttons at least 3/4 inches in their smallest dimensions?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are the controls designated by raised characters or symbols at least 1/32 of an inch high placed immediately to the left of the buttons?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.10.12; 4.30	Do the raised characters have a width-to-height ratio between 3:5 and 1:1?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Do they have a stroke width-to-height ratio between 1:5 and 1:10?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Does the color of the numbers contrast with the color of the background, and is one or the other eggshell in color?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are the raised numbers between 5/8 inch and 2 inches tall?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



	Yes	No	N/A
Are the numbers in upper case sans serif or simple serif font?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the button for the main entry floor designated by a raised star?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.10.12 Do the floor buttons have visual indications to show when each call is registered?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are the floor buttons no higher than 48 inches above the floor for forward approach or 54 inches AFF for side approach?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are the emergency buttons grouped at the bottom of the panel with centerlines no less than 35 inches above the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If the cars have central opening doors, are the controls located on a front wall?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If the cars have side opening doors, are the controls located on the side or front wall adjacent to the doors?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.10.13 Is there a visual car position indicator above the car control panel or over the door to indicate the floor level?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do the numerals illuminate and does an audible signal, 20 db min., sound as the car passes or stops at a floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are the numerals at least 1/2 inch high?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Emergency Communications:

4.10.14 Is there an emergency two-way communication system between the elevator and a point outside the hoistway?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the communication system identified by a raised symbol or lettering?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the highest operable part of a two-way communication system 48 inches above the floor or less?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If the system uses a handset, is the length of the cord from the panel to the handset at least 29 inches?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If the system is in a closed compartment, is the hardware on the compartment door operable with one hand, and does its operation not require tight grasping, pinching or twisting of the wrist?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the emergency intercommunication usable without voice communication?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

# SURVEY FORM 14: ROOMS AND SPACES

Facility Name:

Room or Space Location:

		Yes	No	N/A
4.13	Do the doors comply with 4.13? (Use Survey Form 11: Doors and Gates to determine compliance.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.3	Are aisles at least 36 inches wide except at doors?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Where the accessible pathway makes a U-turn around an obstacle which is less than 48 inches wide, does the pathway width increase to at least 42 inches on the approach and 48 inches in the turn? (Figure 7b)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.4	If the aisles are less than 60 inches wide, are there passing spaces at least 60 inches wide and 60 inches long within reasonable intervals not exceeding 200 feet?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.5	Is there at least 80 inches clear head room in the accessible space?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If head room in part of an accessible space is less than 80 inches is there a cane detectable barrier within 27 inches of the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.4.1	If objects mounted to the wall have bottom edges between 27 and 80 inches from the floor, do they project less than 4 inches into the space? (Wall-mounted objects with bottom edges below 27 inches may project any amount so long as they do not reduce the required clear width of an accessible route of travel.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Do freestanding objects mounted on posts with bottom edges between 27 & 80 inches high project less than 12 inches into the route of travel?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is there an accessible path of at least 36 inches clear alongside the protruding object?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.5.1	Are the floors in all accessible rooms and spaces stable, firm and slip-resistant?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.8; 4.5.2	Is any level change greater than 1/2 inch ramped?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are level changes between 1/4 inch and 1/2 inch beveled with a slope no greater than 1:2?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	When floor materials change, does the vertical difference between them meet these provisions?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.5.3	If carpet or carpet tile is used on the floor, is it securely attached?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is it a low pile carpet with a firm pad or no pad underneath it?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

		Yes	No	N/A
	Is carpet pile 1/2 inch or less?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Signage:</u>				
4.1.3(16); 4.30.2	On room signs, do the letters and numbers have a width-to-height ratio between 3:5 and 1:1, and a stroke width-to-height ratio between 1:5 and 1:10?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.30.5	Does the color of the characters and symbols contrast with the color of the background, and is one or other eggshell in color?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.1.3(16) 4.30.4	Do signs providing permanent identification of rooms and spaces have raised letters?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are the characters upper case sans serif or simple serif?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are the characters and symbols on signs raised 1/32 inch?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are the raised characters or symbols between 5/8 inch and 2 inches tall?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.30.6	Are they mounted on the wall at the latch side of the door at 60 inches above the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Storage:</u>				
4.25.2; 4.2.4	Is there a clear floor space 30 inches by 48 inches at storage facilities which allows for either a forward or side approach in a wheelchair (Figure 5)?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.25.3; 4.2.5	If a side approach is provided, is there storage space between 9 and 54 inches from the floor (Figure 6)?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If a front approach is provided, is there storage space between 9 and 48 inches from the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are clothes rods a maximum of 54 inches from the floor, or 48 inches if reach is more than 10 inches?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.13.5	Where passage is not required to access storage, does the door have at least 20 inches in clear opening width?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.25.4; 4.27.4	Is the hardware on the storage space doors operable with one hand?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the hardware operable without tight grasping, pinching or twisting of the wrist?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Seating, Tables and Work Surfaces:</u>				
4.1.3(18)	Do 5% (but not less than one) of the built-in or fixed seating tables and work surfaces meet the following requirements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Survey Form 14: Rooms and Spaces (Continued)

		Yes	No	N/A
4.32.2; 4.2.4	Do these seating spaces which are provided for people in wheelchairs have a 30 inch by 48 inch clear space which overlaps an accessible route?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is no more than 19 inches of the 30 inch by 48 inch clear space measured under the table? (Figure 45)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.32.3	Is the knee space at least 27 inches high, 30 inches wide and 19 inches deep? (Figure 45)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.32.4	Is the top of the table or work surface between 28 and 34 inches from the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.3.3	Are the aisles between tables at least 36 inches wide?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Controls:</u>				
4.27.3	Are light switches, thermostatic controls, electrical receptacles and similar devices between 15 and 54 inches from the floor when the clear floor space allows a parallel approach?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	OR			
	Are they between 15 and 48 inches when the clear floor space allows only a forward approach?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

# **SURVEY FORM 15: ASSEMBLY ROOMS**

**Facility Name:**

**Assembly Room Location:**

Use in conjunction with Form 14:  
Rooms and Spaces

If places of assembly are provided, they shall comply with the following table:

Capacity of Seating & Assembly Areas	# of Required Wheelchair Locations
4 to 25	1
26 to 50	2
51 to 300	4
301 to 500	6
over 500	6 plus 1 for each 100

	Yes	No	N/A
4.33.1; 4.1.3(19a) Are the required number of wheelchair locations in assembly spaces provided?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.33.2 Is the space for two wheelchairs 66 inches wide? (Please note: There is no requirement that wheelchair spaces must be paired.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If people must wheel into the space from the side, are the spaces at least 60 inches deep?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If people can wheel into the space from in front or behind the space, are the spaces 48 inches deep?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.33.3 Are the wheelchair seating spaces an integral part of the seating plan?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are they dispersed throughout the seating area? (Exception: Accessible viewing positions may be clustered for bleachers, balconies and other areas having sight lines which require slopes greater than 5%.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do they adjoin an accessible route that also serves as a means of egress in an emergency?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are the sightlines from these seating areas comparable to those for all viewing areas?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.33.4; 4.5 Are the floor surfaces at and around these seating areas level, stable, firm and slip-resistant?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are level changes greater than 1/2 inch ramped?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are level changes between 1/4 and 1/2 inch beveled with a maximum slope of 1:2?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If carpet is used in the area, is it a low pile type with firm padding or no padding underneath it?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Yes	No	N/A
Is the carpet pile 1/2 inch or less route?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Where floor materials change, is the vertical difference between them less than 1/2 inch?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If the vertical difference is between 1/4 and 1/2 inch, is it beveled with a slope of 1:2 or less?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.33.5 Is there an accessible route connecting wheelchair seating locations and performance areas including stages, arena floors, dressing rooms, locker rooms and other spaces used by performers?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.1.3(19b) If the assembly area has an audio-amplification system, is there a listening system for persons with severe hearing loss?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If the area is used primarily as meeting or conference space or has no amplification system, is there a permanently installed or portable listening system?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.33.6 If the listening system serves individual fixed seats, are these seats located within a 50-foot viewing distance of the stage or playing area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Do these seats have a complete view of the stage or playing area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



# **SURVEY FORM 16: TOILET ROOMS**

**Facility Name:**

**Toilet Room Location:**

Each public and common use toilet room shall comply with 4.22. Other toilet rooms shall be adaptable. (4.1.3(11))

	Yes	No	N/A
4.22.1 Are the toilet rooms located on an accessible route?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.22.3 Is there an unobstructed turning space (a 60-inch diameter circle or T-shaped space) in the toilet room (Figure 3)?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Doors to Toilet Room, Toilet Stalls and Storage:</u> (Survey each with Form 11: Doors and Gates.)			
4.22.2 Does no door swing into a required clear floor space at an accessible fixture?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Accessible Toilet:</u>			
4.16.2; 4.22.3 Is the centerline of the toilet 18 inches from a wall or partition which is prepared for the installation of a grab bar (Figure 29)?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If the toilet is approached from the front and there is a lavatory alongside the toilet, is there a clear floor space at least 48 inches wide by 66 inches long? (Figure 28)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If the toilet is approached from the side and there is a lavatory alongside the toilet, is there a clear floor space at least 48 inches wide by 56 inches long?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If there is provision for a side approach (no lavatory alongside the toilet) is there a clear floor space at least 60 inches wide by 56 inches long?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.16.3 Is the top of the toilet seat between 17 and 19 inches from the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the seat a type that does not automatically spring back to an open position?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.16.4 If the water closet is not located in a stall, is the back grab bar at least 36 inches long with one end mounted at least 12 inches from the centerline of the toilet?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is the side bar at least 42 inches long with the front end 54 inches from the back wall?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are the grab bars mounted horizontally between 33 and 36 inches above the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

		Yes	No	N/A
4.16.4; 4.26; 4.17.6	Is the diameter of the grab bar between 1¼ inch and 1½ inch? OR Does the shape provide an equivalent gripping surface?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the space between the grab bar and the wall exactly 1½ inches?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are the grab bars secured so that they do not rotate within their fittings?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the grab bar and the wall adjacent to it free of any sharp or abrasive elements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.16.5	Are flush controls automatic or operable with one hand?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are they mounted on the wide side of the toilet area?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are they no higher than 44 inches above the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.16.5; 4.27	Are the flush controls operable without tight grasping, pinching or twisting of the wrist?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Accessible Toilet Stalls:</u>				
4.17.1	Are the accessible toilet stalls on an accessible route?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.17.3	Does the size and arrangement of the accessible toilet stalls comply with the standard stall shown in Figure 30(a)? (Arrangements may be reversed. Alternate stalls are not permitted in new construction.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the stall at least 60 inches wide?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If the toilet is wall mounted, is the stall at least 56 inches deep?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If the toilet is a floor-mounted model, is the stall at least 59 inches deep?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the stall door located at the "open" side of the toilet?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.17.4	If the stall is less than 60 inches deep, does the front partition and at least one side partition have toe clearances of at least 9 inches above the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.17.5; 4.13	When the stall door is open 90 degrees, is there a clear opening of at least 32 inches measured between the face of the door and the edge of the partition on the latch side?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If the stall door swings into the stall, is there at least 36 inches additional depth in the stall? (Figure 30(a-1))	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

		Yes	No	N/A
	If the stall door swings out and the approach is from the latch side, is the aisle approaching the stall at least 42 inches wide?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	OR If the stall door swings out and the approach is from the hinge side, is the aisle approaching the stall at least 48 inches wide?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.17.5; 4.13	If the stall door opens out at the end of an aisle, is there at least 18 inches of maneuvering space at the latch side of the stall door?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.17.6	Are the grab bars placed as shown in Figure 30 a, a-1, c or d?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.16.6	Is the paper dispenser mounted no more than 36 inches from the back wall and at least 19 inches from the floor so as to permit unobstructed use of the grab bar?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Does the dispenser not obstruct use of the grab bar?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Does the dispenser allow continuous paper delivery?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Urinals:</u>				
4.22.5	Where urinals are provided, does at least one meet the following requirements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.18.2	Is the urinal a stall type?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	OR Is the urinal wall hung?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Does the urinal have an elongated rim no more than 17 inches above the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.18.3	Is there a clear floor space 30 by 48 inches which allows a forward approach to the urinal?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Does the clear floor space adjoin or overlap an accessible route?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If urinal shields are provided, is there a minimum of 29 inches between the two panels, and do they not extend beyond the front edge of the urinal rim?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.18.4; 4.27.4	Are the flush controls automatic or operable with one hand without tight grasping, pinching or twisting of the wrist?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are the controls mounted no more than 44 inches above the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Lavatory:</u>				
4.22.6	Does at least one lavatory meet the following requirements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

		Yes	No	N/A
4.19.2	Is the lavatory rim or counter surface no higher than 34 inches above the finished floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is there a clearance of at least 29 inches from the floor to the bottom of the apron?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Do the toe and knee clearances comply with Figure 31?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.19.3	Is there a clear floor space at least 30 by 48 inches in front of the lavatory allowing a forward approach?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is not more than 19 inches of this clear floor space measured underneath the lavatory?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Does the clear floor space adjoin or overlap an accessible route?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.19.4	Are hot water pipes and drain pipes insulated or otherwise covered?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the area below the lavatory free of sharp or abrasive surfaces?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.19.5; 4.27.4	Can the faucet be operated with one hand without tight grasping, pinching or twisting of the wrist?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If the valve is self-closing, does it remain open for at least 10 seconds?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Mirrors:</u>				
4.22.6; 4.19.6	Does at least one mirror have a bottom edge of the reflecting surface no higher than 40 inches from the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Dispensers:</u>				
4.22.7	Is at least one of each dispenser type accessible and on an accessible route?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.22.7; 4.27	Is there a 30 x 48 inch clear space which allows either a forward or a parallel approach to the dispensers?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.22.7; 4.27	If a forward approach is provided, is the highest operable part no higher than 48 inches?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If a side approach is provided, is the highest operable part no higher than 54 inches?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Can the dispenser be operated with one hand without any tight grasping, pinching or twisting of the wrist?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Yes No N/A

Medicine Cabinet:

- 4.23.9 If medicine cabinets are provided, does at least one have a usable shelf no higher than 44 inches from the floor?

☐ ☐ ☐

Storage:

- 4.25.2 Is there a clear floor space 30 x 48 inches at storage facilities which allows for either a forward or side approach in a wheelchair?

☐ ☐ ☐

- 4.25.3 If a side approach is provided, is there storage space between 9 and 54 inches from the floor?

☐ ☐ ☐

If a front approach is provided, is there storage space between 9 and 48 inches from the floor?

☐ ☐ ☐

# SURVEY FORM 17: BATHTUBS AND SHOWERS

Facility Name:

Bathroom Location:

Each public and common use bathroom shall comply with 4.23. 4.1.3(11)

		Yes	No	N/A
4.23.1	Are the accessible bathing facilities on an accessible route?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Bathtubs:</u>				
4.23.8	Where bathtubs are provided, does at least one meet the following requirements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.20.2	Does the clear floor space which depends on the direction of approach comply with Figure 33?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.20.3	Is an in-tub seat at the head of the tub provided?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the seat mounted securely so that it will not slip during use?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.20.4	Are grab bars provided as shown in Figures 33 and 34?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.20.4; 4.26	Is the diameter of the grab bar between 1¼ inches and 1½ inches? OR Does the shape provide an equivalent gripping surface?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the space between the grab bar and the wall exactly 1½ inch?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the grab bar secured so that it does not rotate within the fittings?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the grab bar and the wall adjacent to it free of any sharp or abrasive elements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.20.5; 4.27	Can faucets and other controls be operated with one hand without any tight grasping, pinching or twisting of the wrist?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.20.5	Are they located within the area shown in Figure 34?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.20.6	Is there a shower spray unit with a hose at least 60 inches long?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Can the shower spray unit be both hand-held and fixed to the wall?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.20.7	If provided, are bathtub enclosures located so that they do not obstruct the controls or transfer from a wheelchair onto the bathtub seat?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If the enclosure is mounted on the bathtub, is there no track mounted on the rim?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



Showers:

Yes No N/A

4.23.8 Where showers are provided, is at least one made accessible by meeting the provisions below?

☐ ☐ ☐

4.21.2 Does the shower stall size and clear floor space comply with either Figure 35(a) for a transfer type shower or 35(b) for a roll-in shower?

☐ ☐ ☐

Transfer Type Shower as Shown in Figure 35(a):

4.21.3 If the shower stall is the type shown in Figure 35(a), is it exactly 36 x 36 inches?

☐ ☐ ☐

Is there a clear floor space 36 x 48 inches outside the stall with 12 inches extending beyond the seat wall? (Figure 35(a))

☐ ☐ ☐

Is there a seat mounted between 17 and 19 inches from the floor?

☐ ☐ ☐

Does the seat extend the full depth of the stall?

☐ ☐ ☐

Is the seat on the wall opposite the controls?

☐ ☐ ☐

4.21.4 Are grab bars provided along the control wall and half the back wall, but not behind the seat?

☐ ☐ ☐

4.21.7 If curbs are provided, are they no higher than 1/2 inch?

☐ ☐ ☐

4.21.8 If provided, is a shower stall enclosure located so that it does not obstruct the controls or prohibit transfer from the wheelchair onto the shower seat?

☐ ☐ ☐

4.21.5 Are the controls located within the area shown in Figure 37(a)?

☐ ☐ ☐

4.21.4 Are grab bars provided as shown in Figure 37(a)?

☐ ☐ ☐

Roll-in Type Shower as Shown in Figure 35(b):

4.21.2 Is the roll-in shower at least 30 x 60 inches as shown in Figure 35(b)?

☐ ☐ ☐

Is there a 36 x 60 inch clear floor space alongside the shower as shown in Figure 35(b)?

☐ ☐ ☐

4.21.4 Does a grab bar extend around three sides as shown in Figure 35(b) and Figure 37(b)?

☐ ☐ ☐

4.21.7 Is there no curb at all in the roll-in shower?

☐ ☐ ☐

4.21.5 Are the controls located on the end wall within the area shown in Figure 37(b)?

☐ ☐ ☐

Both Types of Shower:

		Yes	No	N/A
4.21.4;	Is the diameter of the grab bar between 1¼ inch and 1½ inch?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.26	OR			
	Does the shape provide an equivalent gripping surface?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the space between the grab bars and the wall exactly 1½ inches?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the grab bar secured so that it does not rotate within the fittings?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is the grab bar and the wall adjacent to it free of any sharp or abrasive elements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.21.5;	Can the controls be operated with one hand without tight grasping, pinching or twisting of the wrist?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.27.4				
4.21.6	Does the shower spray unit have a hose at least 60 inches long?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Can the shower spray unit be both hand-held and fixed to the wall?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

# **SURVEY FORM 18: RESTAURANTS AND CAFETERIAS**

**Restaurant Name:**

Use Forms 1 to 17 as they apply. In addition to other applicable sections, restaurants and cafeterias must comply with the following requirements.

		Yes	No	N/A
5.3; 4.3.3	Are all aisles between fixed tables at least 36 inches wide except at doors?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
5.1	Where practical, are accessible tables distributed throughout the space or facility?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Where there are mezzanine levels, loggias or raised platforms, are the same services and decorative character provided elsewhere in space located on accessible routes?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Food Service Lines:</u>				
5.2; 5.5	Do food service lines have a clear width of 36 inches or more?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Are tray slides no more than 34 inches above the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	If self-service shelves are provided, are they no more than 54 inches above the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Seating and Tables:</u>				
5.1	Do at least 5% of all fixed seats or tables meet the following requirements?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.32.2; 4.2.4	Do seating spaces provided for people in wheelchairs have a 30 x 48 inch clear floor space which overlaps an accessible route?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Is no more than 19 inches of the 30 x 48 inch clear space measured under the table? (Figure 45)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.32.3	Is the knee space at least 27 inches high, 30 inches wide and 19 inches 19 inches deep? (Figure 45)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
4.32.4	Is the top of the table between 28 and 34 inches from the floor or ground?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Vending Machines:</u>				
4.2; 4.27; 5.8	Is there a 30 x 48 inch clear space at the vending machine which allows either a forward or a parallel approach?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

	Yes	No	N/A
If a forward approach is provided, are the operating parts of the machine, including coin slots, between 15 and 48 inches from the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
If a parallel approach is provided, are the operating parts of the machine, including the coin slots, between 9 and 54 inches from the floor?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are they operable with one hand?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are they operable without tight grasping, pinching or twisting of the wrist?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Dining Areas:</u>			
5.4 Are all dining areas accessible?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Is access provided to mezzanines with seating for more than 33% of the total capacity?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Are the same decor and services provided in the accessible areas as that provided for the general public?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

# SURVEY FORM 19: HEALTH CARE

**Facility Name:**

For Health Care Facilities, use this Form and Forms 1-17 as they apply. In addition to other applicable sections, health care buildings and facilities shall comply with the following.

		Yes	No	N/A
6.1	Are accessible rooms complying with the provisions below provided in the percentages shown below?			
	<ul style="list-style-type: none"> <li>General purpose hospitals, psychiatric and detox facilities minimum 10% of patient bedrooms and toilet rooms and all public and common use areas.</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	<ul style="list-style-type: none"> <li>Hospital and rehabilitation specializing in mobility treatment in all patient bedrooms, toilet rooms and public and common use areas.</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	<ul style="list-style-type: none"> <li>Long-term care and nursing homes 50% of patient bedrooms and toilet rooms and all public and common use areas.</li> </ul>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6.2	Is there at least one accessible entrance covered by a canopy or overhang?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
	Does a passenger loading zone exit at this entrance?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Patient Bedrooms:</u>				
6.3.(1); 4.13	Except for entry doors to acute care hospital bedrooms for in-patients, are the doors accessible? (Use Survey Form 11 to confirm this accessibility.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6.3(1); 4.13.6	In acute care hospitals for in-patients, if the maneuvering space on the latch side of the door is not provided, is the door at least 44 inches wide?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6.3(2); 4.2.3	In a patient bedroom, is there a circle of clear space 60 inches in diameter, or a T-shaped space in which a 180 degree turn can be made?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
6.3(3); 4.3.3	Does each patient bedroom have a minimum clear floor space of 36 inches along each side of the bed and an accessible route (36 clear inches) to each side of the bed?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
<u>Patient Toilet Rooms:</u>				
6.4	Is the patient toilet room accessible? (Use Survey Forms 16 and 17 to confirm this accessibility.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



MEDICAL  
CENTER  
AT  
BOWLING  
GREEN

Appendix 3

January 19, 1993

JOHN C. DUNN  
PRESIDENT AND  
CHIEF EXECUTIVE OFFICER

58

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CHIEF NURSING OFFICER

Scott M. Landrum  
EXECUTIVE VICE PRESIDENT  
OPERATIONS

TO: Jean Craig, Associate Administrative Director, Laboratory  
FROM: Bill Wimberly, Personnel Director *BW*  
RE: **Thesis**

*Del*  
I have received the approval from Doris Thomas, Vice President Human Resources/Marketing and Scott Landrum, Executive Vice President, Operations, for you to do your thesis on The Medical Center and The Americans with Disabilities Act.



Jean Craig  
2545 Thompson Dr.  
Bowling Green, KY 42104

APPENDIX 4

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(survey forms 1-19)

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To be published by:

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